ATTORNEY OR PARTY WITHOUT ATTORNEY
STATE BAR NUMBER:
NAME: Dr. Stewart Lucas Murrey
FIRM NAME:
STREET ADDRESS: 1217 Wilshire Blvd. # 3655
CITY: Santa Monica
STATE: CA
ZIP CODE: 90403
TELEPHONE NO.: 424-278-3017
FAX NO.:
E-MAIL ADDRESS: 2@lucasmurrey.io
ATTORNEY FOR (*name*): In pro per

FOR COURT USE ONLY

[ ] **COURT OF APPEAL, APPELLATE DISTRICT, DIVISION**
[x] **SUPERIOR COURT OF CALIFORNIA, COUNTY OF** Los Angeles
STREET ADDRESS: 111 N. Hill St.
MAILING ADDRESS: 111 N. Hill St.
CITY AND ZIP CODE: Los Angeles 90012
BRANCH NAME: Central

PLAINTIFF/PETITIONER:
Dr. Stewart Lucas Murrey

APPLICATION FOR ORDER TO VACATE PREFILING ORDER AND REMOVE PLAINTIFF/PETITIONER FROM JUDICIAL COUNCIL VEXATIOUS LITIGANT LIST

CASE NUMBER:
23STCV14890

Important, please read: This application must be filed in the court that entered the prefiling order, either in the action in which the prefiling order was entered or in conjunction with a request to the presiding justice or presiding judge to file new litigation under Code of Civil Procedure section 391.7. If you have made an application to vacate a prefiling order that was denied, you may not make another application to vacate in any California court until at least 12 months after the denial.

1. I have been determined to be a vexatious litigant under the California Code of Civil Procedure section 391. This application requests that the court vacate its prefiling order and order my name removed from the statewide vexatious litigant list.

2. The prefiling order or orders were issued in the following case or cases *(list all)*:

Court: Stanely Mosk Courthouse
Case Name: Dr. Murrey v. Gibbons et al.
Case Number: 23STCV14890
Date prefiling order entered: 30 April 2025

Court: _____
Case Name: _____
Case Number: _____
Date prefiling order entered: _____

[ ] Continued on *Attachment* (form MC-025).

3. I request that the prefiling order be vacated under Code of Civil Procedure section 391.8. (Describe below the material change in the facts on which the order was granted and how the ends of justice would be served by vacating the order.)

See the attached memorandum and declaration thereof in support.

[x] Continued on *Attachment* (form MC-025).

Form Approved for Optional Use
Judicial Council of California
VL-120 [Rev. September 1, 2018]

Code of Civil Procedure, § 391.7
www.courts.ca.gov

PLAINTIFF/PETITIONER: Dr. Stewart Lucas Murrey	CASE NUMBER: 23STCV14890

4. [✖] I have not made an application for an order to vacate a prefiling order in the last 12 months.

5. *On Attachment* (form MC-025) is a list of every case filed in the last five years in which I've been a plaintiff, cross-complainant, or defendant, the approximate number of motions I filed in each case, and the number of requests for new litigation that I have filed. *(Include case name, case number, court in which filed, and date filed.)*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

1 May 2025 (DATE)

Dr. Stewart Lucas Murrey (TYPE OR PRINT NAME OF DECLARANT)

(SIGNATURE OF DECLARANT)

For your protection and privacy, please press the Clear This Form button after you have printed the form. Print this form Save this form Clear this form

Dr. Stewart Lucas Murrey
1217 Wilshire Blvd. # 3655
Santa Monica, CA 90403
Tel.: (424) 278-3017
Email: 2@lucasmurrey.io
Website: lucasmurrey.com
SocialMedia: sickoscoop.com/chat

Plaintiff & Plaintiff In Pro Per

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STANELY MOSK COURTHOUSE

DR. STEWART LUCAS MURREY, an individual; Plaintiff, Vs. Kelly Gibbons et al.; Defendants	Case No. 23STCV14890 **MEMORANDUM IN SUPPORT OF PLAINTIFF'S APPLICATION TO VACATE ORDER AND REMOVE PLAINTIFF FROM JUDICIAL COUNCIL VEXATIOUS LITIGANT LIST** Complaint Filed: 27 June 2023 Hon. Lynne M. Hobbs

MEMORANDUM

Because the court failed to get facts right concerning this matter and even fabricated an entire lawsuit case number (LASC case no. 18STCV09056) wherein plaintiff is not even a party to this action (declaration of plaintiff Dr. Stewart Lucas Murrey, ¶ 4, Exh. "1") – and therefore he could never have filed said case –, and finally because this court also refers to a single case twice and is duplicative, plaintiff hereby files his application to vacate this court's order from yesterday 30 April 2025 (decl. Murrey, ¶ 5, Exh. "2") due to a material change in facts on which the order was granted and explains how the ends of justice would be served by vacating the order.

Of the cases this court identifies and which have been settled and/or dismissed within the last seven (7) years are the following:

[redacted]

3) 20STRO04689, Dr. Murrey v. Ms. Jenney Lee, filed on 3 September 2020, dismissed on 18 December 2020 due to a judicial misunderstanding of facts;
4) 20SMRO00271, Dr. Murrey v. Ms. Jenney Lee, filed on 21 December 2020, never adjudicated, and strangely no records;
5) B313458, Dr. Murrey v. Ms. Jenney Lee, filed on 19 May 2021, never adjudicated, dismissed on 9 February 2022 based on a bizarre reference to whether or not the subject case was appealable, which it clearly was and the appellate justice should have known that;
6) 20CIV06217PASK, Dr. Murrey v. Cheaterreport.com, Mr. Aaron Minc, Mr. Domingo Rivera et al. (erroneous duplicated by this court as 21CIV320ATJLC), filed on 15 July 2020, dismissed only for jurisdictional and "federal immunity" reasons, never adjudicated;
7) 2021-1437, Dr. Murrey v. judge Deborah Turner, filed on 28 Novembver 2021 with the Ohio supreme court, never adjudicated;
8) 24STRO03710, Dr. Murrey v. Ms. Vanessa Valdes, filed on 28 May 2024, dismissed along with the dismissal of Valdez' case 24STRO02552 on 11 July 2024;
9) 24STRO04183, Dr. Murrey v. Ms. Kelly Gibbons, filed on 13 June 2024, dismissed without prejudice because the court refused to allow service by email on 8 August 2024;
10) 24STRO04183, Dr. Murrey v. Ms. Elmira (Elly) Shariat, filed on 13 June 2024, dismissed without prejudice because the court refused to allow service by email on 8 August 2024;

Here is it clear these cases represent two groups, if interrelated. Firstly, there is the trauma and aftermath of Dr. Murrey losing his girlfriend Ms. Sherrie Martinez to cancer on 10 March 2018 [redacted]. This pain was already compounded by the anonymous revenge-porn website CHEATERREPORT.COM ("Cheaterreport") that harassed, defamed and used fraudulent third-parties to extort money from plaintiff and his girlfriend from 2017 and 2018 (decl. Murrey, ¶ 6, Exh. "3"). But astonishingly, said suffering was further compounded. As shown below right after plaintiff's girlfriend passed he suffered a false arrest by dirty LAPD police officers who were later exposed [redacted]. Because plaintiff had no money for representation at this time,

he did his best in good faith and filed a few cases to obtain the justice for himself and his girlfriend. In this context, and also as shown below, Ms. Jenney Lee, due to her unique blend of alcoholism and psychological illness, began her savage assaults on plaintiff from which plaintiff had every right to defend himself.

Secondly, as this court is aware from pleading on file in this case, there is the recent cyberbullying attacks and media smear campaigns against plaintiff. As shown below, this includes death threats that he has received and suffered as a result of Kelly Gibbons, Elly Shariat, Olivia Burger, Vanessa Valdes, et al. "doxxing", stalking, harassing, and defaming him. Thus to briefly clarify how this court misunderstood facts right concerning the above-noted ten (10) cases of the past seven (7) years, plaintiff offers a brief account of each in their respective contexts.

Finally, in good faith and in the spirt of honesty and transparency, Dr. Murrey provides his medical records that include the treatment of his person by a professional psychotherapist, Ms. Lilia Santoyo, LCSW, who has provided expert testimony in California courts during the past decades (decl. Murrey, ¶ 7, Exh. "4"). Said psychological evaluation and psychotherapy took place over the course of the past two (2) years (2024-2025) (Ibid.). Similarly in good faith and in the spirit of honesty and transparency, plaintiff also provides a declaration by the attorney Mr. Alexander Petale, Esq., concerning the financial harm caused to him as a result of said conspiracies (decl. Murrey, ¶ 8, Exh. "5"). Any person with even a little bit of common sense and even a modicum of decency and compassion can see herein professional and reasonable assessments of: 1) the sanity and good-natured spirit of plaintiff; as well as 2) the psychological and financial suffering he incurred and against which he has a right to defend himself.

[redacted]

Because Dr. Murrey was then represented by Mr. Petale, Esq., if this case was not properly dismissed via said global settlement in which it was clearly a part, then this is through no fault of the plaintiff.

[redacted] Again, if this case was not properly dismissed via said global settlement in which it was clearly a part, then this is through no fault of the then represented plaintiff.

[redacted]. Plaintiff then properly sued the LAPD for this false arrest, the relevant notary confirmed Dr. Murrey's account, and he settled this case in his favor (decl. Murrey, ¶ 11, Exh. "8").

Reasonably seeking justice for the unusually cruel harm caused to his girlfriend and himself plaintiff filed 20CIV06217PASK, Dr. Murrey v. Cheaterreport.com, Mr. Aaron Minc, Mr. Domingo Rivera et al. (erroneous duplicated by this court as 21CIV320ATJLC) on 15 July 2020. Specifically, plaintiff and his girlfriend Sherrie were being stalked, harassed and defamed on the anonymous revenge-porn website Cheaterreport (decl. Murrey, ¶ 6, Exh. "3"). Both were extorted into paying scamming third-parties like Brandyourself, Rivera and Minc to have the harmful postings removed

(Ibid.) But what makes this unusually cruel and despicable is the fact that plaintiff and Sherrie had to spend money to remove these anonymous postings while they needed money at this time to fight her cancer. This is why plaintiff transferred title of his car to his girlfriend at this time so she could sell her own and raise money (decl. Murrey, ¶ 12). Plaintiff diligently obtained evidence that Brandyourself, Minc et al. work secretly with Rivera and that Rivera is a governmental employee i.e. navy cyber-security agent with top-level clearance (decl. Murrey, ¶ 6, Exh. "3"). It is pretty shocking that the government protects us by speeding up our cancer with its anonymous psychological warfare.

Plaintiff did not have the money for an attorney, but he did the best he could to get justice for his girlfriend and himself. Only through a corruption of law were said defendants able to wiggle out of this case based upon claims of jurisdiction, etc. (decl. Murrey, ¶ 13, Exh. "9"). Through no fault of the plaintiff was this case transferred and assigned a new number in the southern district of New York, prior to plaintiff having any opportunity to dismiss this case (Ibid.). Similar sketchy abuses of the law by the southern district in New York followed, resulting not only in the dismissal of the scam company BrandYourself, but also the court not allowing plaintiff to sue the FCC. Here the "logic" of the southern district of New York is if your girlfriend is dying of cancer and anonymous psychopaths are stalking, harassing, defaming and extorting both of you online, some of them even being governmental employees, you cannot sue the FFC for failing to keep United States citizens safe online because it is like a nation-state that somehow has "sovereign immunity" (decl. Murrey, ¶ 14, Exh. "10"). Punishing plaintiff for filing this case to obtain justice for his girlfriend and himself is just another expression of how the way in which the American legal system functions today would not qualify as a legal system for most Americans.

Although plaintiff has already explained this to this court before, the idiot Aaron Minc used his law firm to harass plaintiff, but this blew up in Minc's face. His lawsuit for abuse of process and

malicious prosecution against Dr. Murrey failed (decl. Murrey, ¶ 15, Exh. "11"). Minc inadvertently proved that the above noted case 20CIV06217PASK, Dr. Murrey v. Cheaterreport.com, Mr. Aaron Minc, Mr. Domingo Rivera et al. (erroneous duplicated by this court as 21CIV320ATJLC) was not abusive, nor malicious, despite the fact that Minc is an attorney and he and law firm sued plaintiff Dr. Murrey who had to represent himself out of state in Ohio and in pro per (Ibid.). During the course of this litigation plaintiff reasonably sought to find out who is responsible for the anonymous revenge-porn website Cheaterreport that harm him and girlfriend so despicably (decl. Murrey, ¶ 6, Exh. "3"). To wiggle of out this and continue his scam Minc absurdly claimed he could hide person's names and identities because in Ohio they are considered "trade secrets" (decl. Murrey, ¶ 16, Exh. "12"). The judge of this case failed to follow the law and plaintiff reasonably filed a petition with the Ohio supreme court to overturn the judge's decision regarding discovery (decl. Murrey, ¶ 17, Exh. "13"). The Ohio supreme court refused to take up plaintiff's petition which was never heard (Ibid.).

The cases re: Lee are related, if separated by Lee's unique and independent form of alcoholism and mental illness. By 2019 Lee began sending plaintiff increasingly aggressive and harassing communications (decl. Murrey, ¶ 18, Exh. "14"). Then Lee escalated her harassment by filing a bizarrely anonymous small claims case against plaintiff that failed (decl. Murrey, ¶ 19, Exh. "15"). Because Lee's harassment was severe and had no end in sight plaintiff reasonably sought a legal remedy. First he filed a civil restraining order which he generously dismissed per the stipulation in court that Lee would cease harassing him (decl. Murrey, ¶ 20, Exh. "16"). However, Lee retaliated by filing her own restraining order. Because the court informed Dr. Murrey that if Lee continued to harass him, then he should file a new restraining order against Lee (Ibid.).

Because Lee continued to harass him, plaintiff was forced to file a new restraining order, which is the one to which court refers LASC case no. 20STRO04689 and his granting of Lee's

petition on 18 December 2020 (decl. Murrey, ¶ 21, Exh. "17"). But four months later judge Young admitted that his rationale for his restraining order petition decisions was his false belief that plaintiff had filed a police report against Lee when in truth and actual fact Lee had filed a malicious police report against plaintiff (decl. Murrey, ¶ 22, Exh. "18"). For this reason – and because plaintiff had already been traumatized by being falsely arrested after his girlfriend passed from cancer – plaintiff reasonably filed a petition against Lee and appeal to protect himself i.e. the two cases to which this court refers: 20SMRO00271 and B313458. Eventually judge Young seems to have noticed his grave error and Lee's attempt to renew her only one (1) year restraining order was denied. Further, Dr. Murrey's main case against Lee (LASC no. 19SMSC01862) was successful and defendant Lee initiated a settlement discussion. To atone for her disgusting behavior Lee revealed herself to be one of the sources of evidence against the current defendants in plaintiff's cases against Gibbons, Blalock, Vanderford, Valdes, Burger, Facebook, et al. Because of Lee's attempt to finally do something right, plaintiff reciprocated by agreeing to dismiss his case against her per a settlement, which since has been sealed. For these reasons, punishing plaintiff for defending himself against Lee is also unreasonable.

Last but not least: the court is already aware that Valdez initiated and filed her own harassing and failed restraining order petition against plaintiff on 12 April 2024 (decl. Murrey, ¶ 23, Exh. "19"). As pleadings on file with this court show, plaintiff in fact had more of reason to obtain a restraining order against Valdez. Specifically, Valdez, Gibbons, Shariat et al. had conspired to create a GoFundMe webpage whereupon they defamed plaintiff by publishing a false story of him stalking Shariat (who plaintiff has actually never even met) (decl. Murrey, ¶ 24, Exh. "20"). Then Valdez, Gibbons, Shariat et al. promoted this webpage on national and international news media outlets to billions of viewers (Ibid.). Soon after plaintiff started receiving death threats (Ibid.). For these reasons

plaintiff filed a restraining order against Valdez AFTER she filed her petition on 28 May 2024 (24STRO03710, Dr. Murrey v. Ms. Vanessa Valdez). Although both petitions were denied on 11 July 2024 (decl. Murrey, ¶ 23, Exh. "19"), the transcript reveals the psychopathy of Valdez (decl. Murrey, ¶ 25, Exh. "21").

Regarding the two cases left: 24STRO04183, Dr. Murrey v. Ms. Kelly Gibbons and 24STRO04183, Dr. Murrey v. Ms. Elmira (Elly) Shariat both filed on 13 June 2024 were reasonable given the above-noted conspiracy to threaten plaintiff's life in which both Gibbons and Shariat are involved (decl. Murrey, ¶ 24, Exh. "20"). And neither of these two cases were adjudicated. Because both Gibbons and Shariat aggressively evade service, plaintiff requested the court give him leave to serve both by email (decl. Murrey, ¶ 26, Exh. "22"). As noted above, plaintiff has been financially harmed and he lacked the resources to hire detectives to find and serve said women (decl. Murrey, ¶ 8, Exh. "5"). But the court refused to allow service by email and dismissed the cases through no fault of the plaintiff (decl. Murrey, ¶ 27). Interestingly, the same judge bizarrely allowed Valdez to serve plaintiff by email months earlier after Valdez, no charge to her due to Valdez' fee waiver, only had a sheriff try to serve plaintiff at a location that has nothing to do with his residence (decl. Murrey, ¶ 28, Exh. "23"). In other words, because plaintiff happens to be male and is thus sexually discriminated against in the California legal, his restraining order petitions against Gibbons and Shariat were dismissed through no fault of his own.

As of now plaintiff has the current case against Gibbons et al. and a case against Facebook for related, but different causes.

I. CONCLUSION

For good cause shown, plaintiff Dr. Murrey requests that the court show both an understanding of the basic facts of this matter as well as a modicum of compassion and grant his

application. In the alternative plaintiff requests that the court identify which cases it believes to qualify plaintiff as a vexatious litigant such that he can have clarity on when he can expect to re-apply to have his name removed from said list.

Dated: 1 May 2025

Respectfully submitted by,

/s/Stewart Lucas Murrey_____

Dr. Stewart Lucas Murrey
Plaintiff & Plaintiff in Pro Per
1217 Wilshire Blvd. # 3655
Santa Monica, CA 90403
Tel.: (424) 278-3017
Email: 2@lucasmurrey.io
Website: lucasmurrey.com
SocialMedia: sickoscoop.com/chat

Dr. Stewart Lucas Murrey
1217 Wilshire Blvd. # 3655
Santa Monica, CA 90403
Tel.: (424) 278-3017
Email: 2@lucasmurrey.io
Website: lucasmurrey.com
SocialMedia: sickoscoop.com/chat

Plaintiff & Plaintiff In Pro Per

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STANELY MOSK COURTHOUSE

DR. STEWART LUCAS MURREY, an individual; Plaintiff, Vs. Kelly Gibbons et al.; Defendants	Case No. 23STCV14890 **DECLARATION OF PLAINTIFF DR. MURREY IN SUPPORT OF PLAINTIFF'S APPLICATION TO VACATE ORDER AND REMOVE PLAINTIFF FROM JUDICIAL COUNCIL VEXATIOUS LITIGANT LIST** Complaint Filed: 27 June 2023 Hon. Lynne M. Hobbs

I, Dr. Stewart Lucas Murrey, declare as follows:

1. That I am the plaintiff in this action; that I am over the age of 18 years and that I have personal knowledge of the facts contained in this declaration. If called upon to testify I could and would testify competently as to the truth of the facts stated herein.
2. I received my Doctorate of Philosophy (Ph.D) from Yale University in 2011, I have since published various books and articles on the origins of money and tragedy; I am presently working on new material while I continue to join my voice to peaceful protests supporting

civil rights for all peoples everywhere. Based upon these achievements I use the title doctor in front of my name.

3. This declaration is submitted in support of plaintiff's application to vacate order and remove plaintiff from judicial council litigant list.
4. A true and correct copy of LASC case no. 18STCV09056) wherein plaintiff is not even a party to this action is hereto attached as Exhibit 1.
5. A true and correct copy of this court's order from 30 April 2025 is hereto attached as Exhibit 2.
6. A true and correct copy of excerpts of Sherri and I being stalked, harassed and defamed on the anonymous revenge-porn website Cheaterreport.com ("Cheaterreport") and being extorted by anonymous "third-parties" like Aaron Minc and Domingo Rivera who were secretly running the harmful scam in 2017 and 2018 is hereto attached as Exhibit 3.
7. A true and correct copy of my medical records regarding past psychotherapy is hereto attached as Exhibit 4.
8. A true and correct copy of Mr. Alexander J. Petale, Esq.'s declaration of the financial harm I have suffered is hereto attached as Exhibit 5.
9. A [redacted]

11. A true and correct copy of my settlement with the LAPD in my favor as well as the notary's authenticated account is hereto attached as Exhibit 8.

12. Because Sherrie and I needed to raise money to fight her cancer in early 2018 I transferred title of my car as we intended to sell her car.
13. A true and correct copy of the dismissal upon jurisdictional grounds etc. of my case 20CIV06217PASK, Dr. Murrey v. Cheaterreport.com, Mr. Aaron Minc, Mr. Domingo Rivera et al. (erroneous duplicated by this court as 21CIV320ATJLC) which was then by the court automatically transferred and given a new case no. 21CIV320ATJLC in the southern district of New York is hereto attached as Exhibit 9.
14. A true and correct copy of the dismissal of my Los Angeles case in New York based upon a corrupt claim of "sovereign immunity" behind which the FCC hides is hereto attached as Exhibit 10.
15. A true and correct copy of Minc's failed lawsuit against me for abuse of process and malicious prosecution regarding the above-noted case is hereto attached as Exhibit 11.
16. A true and correct copy of Minc's attempt to hide his criminal scam and accomplices behind corrupted law is hereto attached as Exhibit 12.
17. A true and correct copy of my good faith attempt to obtain discovery about Minc's online criminal operation via a petition with the Ohio Supreme court is hereto attached as Exhibit 13.
18. A true and correct copy of the increasing harassing communications I received from Ms. Jenney Lee is hereto attached as Exhibit 14.
19. A true and correct copy of Lee's failed anonymous small claims case against me from 2019 is hereto attached as Exhibit 15.
20. A true and correct copy of my stipulation per the judge's recommendation to dismiss Lee since she agreed to stop harassing me is hereto attached as Exhibit 16.

21. A true and correct copy of judge Mark Young's denial of my restraining order against Lee LASC case no. 20STRO04689 and the granting of her petition on 18 December 2020 is hereto attached as Exhibit 17.

22. A true and correct copy of judge Young admitting his rationale based upon false facts regarding a police report that I never filed, but which Young confused with a malicious police report that Lee filed is hereto attached as Exhibit 18.

23. A true and correct copy of Valdez' harassing and failed restraining order petition is hereto attached as Exhibit 19.

24. A true and correct copy of Valdez, Gibbons, Shariat et al. promoting their defamatory GoFundMe webpage to billions of viewers resulting in death threats against my person is hereto attached as Exhibit 20.

25. A true and correct copy of excerpts and the full transcripts of Valdez' failed restraining order petition against me is hereto attached as Exhibit 21.

26. I request to serve both Gibbons and Shariat via email and a true and correct copy of my good faith efforts to serve them as my resources were running out is hereto attached as Exhibit 22.

27. The court refused to allow me to alternatively serve Gibbons and Shariat via email.

//

//

//

28. A true and correct copy of the same judge bizarrely allowing Valdez to serve me via email though she put little effort into serving me is hereto attached as Exhibit 23.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 1 May 2025 at Los Angeles, California.

_/s/Stewart Lucas Murrrey_____
Dr. Stewart Lucas Murrey, Declarant

EXHIBIT 1

Civil Case Access

Language Access
English

Case Information | | FUTURE HEARINGS | PARTY INFORMATION | Documents Filed | Past Proceedings

CASE INFORMATION: 18STCV09056

Case Title:	TORI A. HILL VS ARMAN MARANDA, ET AL.
Filing Courthouse:	Spring Street Courthouse
Filing Date:	12/19/2018
Case Type:	Motor Vehicle - Personal Injury/Property Damage/Wrongful Death (General Jurisdiction)
Status:	Court-Ordered Dismissal - Before Trial - Lack of Prosecution on 11/24/2020

Click here to access document images for this case.
If this link fails, you may go to the Case Document Images site and search using the case number displayed on this page

New Search

FUTURE HEARINGS

Case Information | | FUTURE HEARINGS | PARTY INFORMATION | Documents Filed | Past Proceedings

PARTY INFORMATION

Case Information | | FUTURE HEARINGS | PARTY INFORMATION | Documents Filed | Past Proceedings

HILL TORI A.	Plaintiff
MARANDA ARMAN	Defendant
PIRIAN WIESMAN	Attorney for Plaintiff
SAKKESTAD ROSEMARIE	Defendant

DOCUMENTS FILED

Case Information | | FUTURE HEARINGS | PARTY INFORMATION | Documents Filed | Past Proceedings

11/24/2020	Certificate of Mailing for	Filed by Clerk
11/24/2020	Minute Order	Filed by Clerk

Of the cases presented by Defendant, the court finds 13 that fit the criteria of Code of Civil Procedure § 391, subd. (b)(1). They are as follows:

1. 17SMRO00352, Murrey v. Edwards, a restraining order petition brought by Plaintiff, and denied on December 12, 2017;

2. 18STCV09056, Murrey v. Young, a complaint for civil harassment and civil conspiracy filed by Plaintiff, dismissed on June 30, 2021 for failure to prosecute;

3. 18STRO07818, Murrey v. Martinez, another restraining order petition brought by Plaintiff and dismissed for lack of prosecution on August 6, 2019;

4. 18STLC05174, Murrey v. Martinez, a complaint for defamation and slander brought by Plaintiff, dismissed by Plaintiff on November 19, 2018;

5. 20SMRO00271, Murrey v. Lee, a restraining order petition brought by Plaintiff, denied on February 8, 2021;

6. 20STRO04689, Murrey v. Lee, a restraining order petition brought by Plaintiff, denied on December 18, 2020;

EXHIBIT 2

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 61

23STCV14890 April 29, 2025
STEWART LUCAS MURREY vs KELLY GIBBONS, et al. 10:00 AM

Judge: Honorable Lynne M. Hobbs
Judicial Assistant: Vanessa Trujillo
Courtroom Assistant: Diana De Leon

CSR: None
ERM: None
Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): Stewart Lucas Murrey (Telephonic) in Pro Per

For Defendant(s): Amy Blalock in Pro Per (Telephonic); Kelly Gibbons in Pro Per (Telephonic);

Elly Shariat in Pro Per (Telephonic) -- See additional appearances below.

NATURE OF PROCEEDINGS: Case Management Conference; Hearing on Motion to Quash Service of Summons; Hearing on Special Motion to Strike under CCP Section 425.16 (Anti-SLAPP motion); Order to Show Cause Re: Sanctions in the Amount of $60.00 Against Plaintiff for Each Unserved Defendant Pursuant to CRC Rule 3.110(b)(f); Status Conference Re: Bankruptcy

The Court's tentative ruling is electronically posted on the Court's website before the hearing is held.

The matter is called for hearing and argued.

After considering the moving papers, all documents relating to the motion, and oral arguments, the Court adopts its tentative ruling as the final ruling of the Court as follows:

Tentative:

Defendant Lena Vanderford’s Special Motion to Strike (anti-SLAPP) is GRANTED as to all causes of action in the First Amended Complaint except the first, second, and fifth causes of action for defamation and false light, as to which the motion is DENIED. Defendant’s Motion to Declare Plaintiff Stewart Lucas Murrey a vexatious litigant is GRANTED in part, and Plaintiff Stewart Lucas Murrey is declared a vexatious litigant subject to a pre-filing order under Code of Civil Procedure § 391.7. Defendant’s request for an order requiring security is DENIED.

Defendant Elmira Shariat’s Motion to Quash Service of Summons is GRANTED.

Analysis:

I. SPECIAL MOTIONS TO STRIKE

In 1992 the Legislature enacted Code of Civil Procedure section 425.16 as a remedy for the "disturbing increase in lawsuits brought primarily to chill the valid exercise of the constitutional rights of freedom of speech and petition for the redress of grievances." (Code Civ. Proc., §425.16, subd. (a); Wilcox v. Superior Court (1994) 27 Cal.App.4th 809, 817.) The lawsuits are commonly referred to as "SLAPP" lawsuits, an acronym for "strategic lawsuit against public participation." (Equilon Enterprises, LLC v. Consumer Cause, Inc. (2002) 29 Cal.4th 53, 57, fn. 1.) A defendant opposing a SLAPP claim may bring an "anti-SLAPP" special motion to strike any cause of action "arising from any act of that person in furtherance of the person's right of petition or free speech under the United States Constitution or the California Constitution in connection with a public issue . . . ." (Code Civ. Proc., § 425.16, subd. (b)(1).) An anti-SLAPP motion may be addressed to individual causes of action and need not be directed to the complaint as a whole. (Shekhter v. Financial Indemnity Co. (2001) 89 Cal.app.4th 141, 150.)

In ruling on an anti-SLAPP motion, a trial court uses a "summary-judgment-like procedure at any early stage of the litigation." (Varian Medical Systems, Inc. v. Delfino (2005) 35 Cal.4th 180, 192.) This is a two-step process. First, the defendants must show that the acts of which the plaintiff complains were taken "in furtherance of the [defendant]'s right of petition or free speech under the United States of California Constitution in connection with a public issue." (Code Civ. Proc., §425.16 subd. (b)(1).) Next, if the defendant carries that burden, the burden shift to the plaintiff to demonstrate a probability of prevailing on the claim. (Code Civ. Proc., § 425.16 subd. (b)(3).)

In making both determinations the trial court considers "the pleadings, and supporting and opposing affidavits stating the facts upon which the liability or defense is based." (Code Civ. Proc., § 425.16, subd. (b)(2); Equilon Enterprises, supra, 29 Cal.4th at p. 67.)

A. PROTECTED ACTIVITY

The anti-SLAPP statute defines protected activities as:

(1) any written or oral statement or writing made before a legislative, executive, or judicial proceeding, or any other official proceeding authorized by law, (2) any written or oral statement or writing made in connection with an issue under consideration or review by a legislative, executive, or judicial body, or any other official proceeding authorized by law, (3) any written or oral statement or writing made in a place open to the public or a public forum in connection with an issue of public interest, or (4) any other conduct in furtherance of the exercise of the

constitutional right of petition or the constitutional right of free speech in connection with a public issue or an issue of public interest. (Code Civ. Proc., § 425.16, subd. (e), emphasis added.)

Defendant Lena Vanderford (Defendant) argues that the claims against her alleged in Plaintiff Stewart Lucas Murrey's (Plaintiff) First Amended Complaint (FAC) arise from protected activity, namely, ""written or oral statement[s] or writing[s] made in a place open to the public or a public forum in connection with an issue of public interest," as well as "any other conduct in furtherance of the exercise of the constitutional right of free speech in connection with a public issue or an issue of public interest." (Motion at pp. 6–7.) Defendant bases this contention on the nature of the conduct alleged against her, which consists of posts made in a Facebook group called "Are We Dating the Same Guy – Los Angeles," evidently a Facebook group in which users post or inquire with other users about men they have dated or are looking into dating. (Ibid.; FAC ¶ 4.)

As noted in this court's prior orders discussing other Defendants' alleged misconduct, the FAC's allegation of misconduct is as follows:

Defendants wrote, published, and circulated defamatory statements about plaintiff to millions of users on Facebook . . . that include the following states: "Public records show" [that plaintiff has] involvement in [a] MURDER case of his ex-wife," is "suspected of murder"; [h]as several domestic violence charges filed against him"; has "filed court cases against women trying to extort money from them"; "[h]as acted aggressively in court"; "has STDs"; has an "ex-wife who was killed"; deserves to be "ARRESTED"; "claim[s] he is an attorney"; and that plaintiff is listed on the California court's public record as being a vexatious litigant."

(FAC ¶ 8.)

The FAC does not specify which of the proposed statements were made by Defendant Vanderford, but in her motion she refers to a Facebook comment in which she responds to news that Plaintiff had been banned from the dating platform Hinge for "fraudulent" behavior, with the comment, "'fraudulent' meaning abusive murderer?", followed by a laughing emoji. (Motion at p. 3; Murrey Decl. Exh. A.)1 Plaintiff in opposition points to other statements made by Defendant in the same forum, stating that Plaintiff is "truly dangerous" (Murrey Decl. Exh. A), and elsewhere stating, evidently in response to a post about Plaintiff:

Omg run. A few years ago he stood me up for an 8 am coffee date on a Saturday and called at like 11 when he "woke up". He's been posted in other groups. He is a widower and suspected of murdering his wife. You can google it. It was also posted that he is broke and a total user and

fake.

(Murrey Decl. Exh. C.)

The allegations of wrongdoing against Defendant Vanderford are similar in character to the allegations made against Defendants Vanessa Valdes and Liv Burger which were the subject of prior anti-SLAPP motions granted by this Court on April 8, 2024. The analysis of those rulings is applicable to Defendant here.

From the above, there is ample basis to conclude that Plaintiff's suit against Valdes arises from protected activity, both through statements made in a public forum concerning an issue of public interest and through conduct in furtherance of the exercise of the constitutional right of free speech in connection with a public issue or an issue of public interest. Valdes's statements were made in an online Facebook group to what Plaintiff's FAC characterizes as an audience of "millions." (FAC ¶ 10.) Similar online postings have been held to involve a "classic public forum." (Chaker v. Mateo (2012) 209 Cal.App.4th 1138, 1146.)

Plaintiff's objection that he was not permitted to join the group in question does not obviate the character of public forum. (Opposition at pp. 10–11.) Smaller scale, closed publications have been held to amount to public fora. Statements made in a newsletter of limited circulation to a small neighborhood of homeowners and characterized as "a mouthpiece for a small group of homeowners who generally would not permit contrary viewpoints to be published in the newsletter" has likewise been held to be a public forum. (Damon v. Ocean Hills Journalism Club (2000) 85 Cal.App.4th 468, 476.) A federal court applying this precedent ruled that even a private Facebook group of 14,900 members could constitute a public forum under the anti-SLAPP statute. (Hicks v. Bradford (C.D. Cal., Dec. 13, 2022, No. CV217330DMGGJSX) 2022 WL 20689541, at *4.) Thus the statements at issue here were made in a public forum.

The evidence and pleadings also establish that Valdes's posts involved a matter of public interest: women's security against male violence and harassment. Plaintiff's allegations disclose as much. He states that these and other Facebook groups "allegedly exist to protect women." (FAC ¶ 59.) In his original Complaint, he found fault with Defendants "postur[ing] about protecting women" in their posts. (Complaint ¶ 30.) He contended that the posters "aggressively promote themselves . . . as champions and protectors of women." (Complaint ¶ 31.) . . . Although Plaintiff contends that these representations are insincere, this alleged insincerity would not remove the subject of discussion from the public interest. Courts have held comments made on a "Ripoff Report Web site" about a business owner's "character and business practices," concerned a public interest under the anti-SLAPP statute. (Chaker, supra, 209 Cal.App.4th at p.

1146.) Valdes' comments about Plaintiff's harassing conduct, on a forum directed to warning women against men who engage in such conduct, concerned at least as great a public interest.

(4/9/2024 Ruling.)

The above reasoning applies squarely to Defendant Vanderford's motion. Plaintiff's belated attempt to re-characterize his claims as not being dependent upon the posts in this public forum is unconvincing and belied by the pleadings. (Opposition at pp. 4–6; FAC ¶¶ 99, 127–128.) The court therefore proceeds to assess the second prong of the anti-SLAPP analysis.

B. LIKELIHOOD OF PREVAILING

After a defendant meets their burden of showing that the gravamen of the complaint involves protected activity, the plaintiff must then "demonstrate that the complaint is both legally sufficient and supported by a sufficient prima facie showing of facts to sustain a favorable judgment if the evidence submitted by the plaintiff is credited." (Matson v. Dvorak (1995) 40 Cal.App.4th 539, 548.) A defendant can meet its burden if it can establish that the plaintiff cannot overcome an affirmative defense. (Birkner v. Lam (2007) 156 Cal.App.4th 275 at 285.) "[A] plaintiff cannot simply rely on his or her pleadings, even if verified. Rather, the plaintiff must adduce competent, admissible evidence." (Grenier v. Taylor (2015) 234 Cal.App.4th 471, 480.)

"Legally sufficient" means that the cause of action would satisfy a demurrer. (Dowling v. Zimmerman (2001) 85 Cal.App.4th 1400, 1421.) The evidentiary showing must be made by competent and admissible evidence. (Morrow v. Los Angeles Unified School District (2007) 149 Cal.App.4th 1424, 1444.) Proof, however, cannot be made by declaration based on information and belief. (Evans v. Unkow (1995) 38 Cal.App.4th 1490, 1497–1498.) The question is whether the plaintiff has presented evidence in opposition to the defendant's motion that, if believed by the trier of fact, is sufficient to support a judgment in the plaintiff's favor. (Zamos v. Stroud (2004) 32 Cal.4th 958, 965.)

Defamation "involves (a) a publication that is (b) false, (c) defamatory, and (d) unprivileged, and that (e) has a natural tendency to injure or that causes special damage." (Price v. Operating Engineers Local Union No. 3 (2011) 195 Cal.App.4th 962, 970.) A false light claim based upon the same facts as a defamation claim "must meet the same requirements." (Hawran v. Hixson (2012) 209 Cal.App.4th 256, 277.) "The sine qua non of recovery for defamation ... is the existence of falsehood." [Citation.] Because the statement must contain a provable falsehood, courts distinguish between statements of fact and statements of opinion for purposes of

defamation liability. Although statements of fact may be actionable as libel, statements of opinion are constitutionally protected." (ZL Technologies, Inc. v. Does 1-7 (2017) 13 Cal.App.5th 603, 624.)

Defendant here argues that her comment about Plaintiff being an "abusive murderer" was mere hyperbole, characteristic of internet fora and unlikely to be taken as a straightforward assertion of a defamatory fact. (Motion at pp. 3–4, citing Chaker v. Mateo (2012) 209 Cal.App.4th 1138, 1149 [holding that comments were made on "internet web sites" which "plainly invited the sort of exaggerated and insulting criticisms of businesses and individuals which occurred here"].) However, Plaintiff presents evidence not merely of the "abusive murderer?" comment paired with a laughing emoji, but another comment straightforwardly warning a user that Plaintiff is a "widower and suspected of murdering his wife." (Murrey Decl. Exh. C.) This comment, the truth of which Plaintiff denies in his accompanying declaration (Murrey Decl. ¶ 7), carries a defamatory meaning.

Plaintiff has therefore satisfied his burden to show the legal and factual sufficiency of his first, second, and fifth causes of action for defamation and false light, and the motion is properly DENIED as to these claims. Plaintiff has not, however, presented any evidence to support his remaining claims against Defendant. There is no evidence to support the claim for invasion of privacy, as Plaintiff presents no acts on the part of Defendant that constituted a public disclosure of a private fact. (Morrow v. Los Angeles Unified School Dist. (2007) 149 Cal.App.4th 1424.)

Nor is there a factual basis for a claim of intentional infliction of emotional distress. "The elements of a prima facie case for the tort of intentional infliction of emotional distress are: (1) extreme and outrageous conduct by the defendant with the intention of causing, or reckless disregard of the probability of causing, emotional distress; (2) the plaintiff's suffering severe or extreme emotional distress; and (3) actual and proximate causation of the emotional distress by the defendant's outrageous conduct." (Miller v. Fortune Commercial Corporation (2017) 15 Cal.App.5th 214, 228–29.) Here, Plaintiff presents no evidence to indicate that Defendants' comments, made on a Facebook group from which Plaintiff was allegedly excluded, were made with the intent or reckless disregard of causing Plaintiff emotional distress.

Plaintiff makes no effort to defend his third, fourth, seventh, ninth, tenth, or eleventh causes of action for sex discrimination, gender violence, Bane Act violation, intentional and negligent interference with economic advantage, and declaratory relief.

Defendant's anti-SLAPP motion is therefore GRANTED as to all causes of action in the First Amended Complaint except the first, second, and fifth causes of action for defamation and false

light, as to which the motion is DENIED.

II. MOTION TO DECLARE VEXATIOUS LITIGANT

Defendant Vanderford's anti-SLAPP motion is accompanied by a motion seeking a declaration that Plaintiff is a vexatious litigant under Code of Civil Procedure § 391 and seeking security against further suit under Code of Civil Procedure § 391.3. (Motion at pp. 9–16.)

(b) "Vexatious litigant" means a person who does any of the following:

(1) In the immediately preceding seven-year period has commenced, prosecuted, or maintained in propria persona at least five litigations other than in a small claims court that have been (i) finally determined adversely to the person or (ii) unjustifiably permitted to remain pending at least two years without having been brought to trial or hearing.

(2) After a litigation has been finally determined against the person, repeatedly relitigates or attempts to relitigate, in propria persona, either (i) the validity of the determination against the same defendant or defendants as to whom the litigation was finally determined or (ii) the cause of action, claim, controversy, or any of the issues of fact or law, determined or concluded by the final determination against the same defendant or defendants as to whom the litigation was finally determined.

(3) In any litigation while acting in propria persona, repeatedly files unmeritorious motions, pleadings, or other papers, conducts unnecessary discovery, or engages in other tactics that are frivolous or solely intended to cause unnecessary delay.

(4) Has previously been declared to be a vexatious litigant by any state or federal court of record in any action or proceeding based upon the same or substantially similar facts, transaction, or occurrence.

(Code Civ. Proc. § 391, subd. (b)(1)–(4.) The following criteria apply to vexatious litigant determinations made under subdivision (b)(1):

A court may declare a person to be a vexatious litigant who, in "the immediately preceding seven-year period has commenced, prosecuted, or maintained in propria persona at least five litigations other than in a small claims court that have been ... finally determined adversely to the person. (§ 391, subd. (b)(1).) The term " '[l]itigation' " is defined broadly as "any civil action or proceeding, commenced, maintained or pending in any state or federal court." (§ 391, subd. (a).)

A litigation includes an appeal or civil writ proceeding filed in an appellate court. (McColm v. Westwood Park Assn. (1998) 62 Cal.App.4th 1211, 1216, 73 Cal.Rptr.2d 288; In re R.H. (2009) 170 Cal.App.4th 678, 691–692, [88 Cal.Rptr.3d 650].) A litigation is finally determined adversely to a plaintiff if he does not win the action or proceeding he began, including cases that are voluntarily dismissed by a plaintiff. *407 (Tokerud v. Capitolbank Sacramento (1995) 38 Cal.App.4th 775, 779, 45 Cal.Rptr.2d 345; In re Whitaker (1992) 6 Cal.App.4th 54, 56, [8 Cal.Rptr.2d 249].)5

(Garcia v. Lacey (2014) 231 Cal.App.4th 402, 406–407.)

Defendant presents a list of 17 litigations prosecuted or maintained by Plaintiff in the past seven years, which she contends were prosecuted in propria persona and determined adversely to him. (Motion at pp. 10–18.) Plaintiff vigorously contests Defendant's characterization of these prior proceedings, variously contending that they are beyond the scope of the seven-year time limit, were resolved by settlement, or were otherwise maintained reasonably and in good faith. (Opposition at pp. 6–29.)

Of the cases presented by Defendant, the court finds 13 that fit the criteria of Code of Civil Procedure § 391, subd. (b)(1). They are as follows:

1. 17SMRO00352, Murrey v. Edwards, a restraining order petition brought by Plaintiff, and denied on December 12, 2017;

2. 18STCV09056, Murrey v. Young, a complaint for civil harassment and civil conspiracy filed by Plaintiff, dismissed on June 30, 2021 for failure to prosecute;

3. [redacted]

[redacted];

5. 20SMRO00271, Murrey v. Lee, a restraining order petition brought by Plaintiff, denied on February 8, 2021;

6. 20STRO04689, Murrey v. Lee, a restraining order petition brought by Plaintiff, denied on December 18, 2020;

7. B313458, Lee v. Murrey, an appeal to the Second District of the California Court of Appeals by Murrey from both 20STRO04689 and 20SMRO00181, Lee v. Murrey, a restraining order petition brought by Jenney Lee against Plaintiff, which was granted on December 18, 2020. Plaintiff's appeal was dismissed on February 9, 2022.2

8. Murrey v. Minc a civil action brought by Plaintiff in the United States Court, Southern District of New York, dismissed by the court on motion of defendants on June 3, 2022

(See Murrey v. Minc (S.D.N.Y., June 3, 2022, No. 21CIV320ATJLC) 2022 WL 1910127, at *1.)

9. State of Ohio ex rel. Stewart Lucas Murrey v. Judge Deborah Turner, Case No. 2021-1437 an appeal from discovery orders made against Plaintiff in a civil suit brought by him against Aaron Minc, which appeal was dismissed by the appellate court on the motion of respondent on February 23, 2022. (See Murrey v. Turner (2022) 166 Ohio St.3d 1404);

10. Murrey v. Brandyourself.com, Inc., Case No. No. 21CIV320ATJLC, a civil action brought by Plaintiff in the United States Court for the Southern District of New York, dismissed with prejudice on February 6, 2023;

11. 24STRO03710, Murrey v. Valdes, a temporary restraining order petition brought by Plaintiff against Vanessa Valdes, a defendant in this case, which Plaintiff filed a little more than a month after her anti-SLAPP motion in this matter was granted. The petition was denied on August 19, 2024;

12. 24STRO04183, Murrey v. Gibbons, a temporary restraining order petition brought against Kelly Gibbons, a defendant in this case, dismissed for lack of prosecution on August 8, 2024;

13. 24STRO04183, Murrey v. Shariat, a temporary restraining order petition brought by Plaintiff against Elly Shariat, a defendant in this case, filed on June 13, 2024, less than a month after this court granted Shariat's motion to quash service of summons. Plaintiff's petition was dismissed for lack of prosecution on August 8, 2024.

The above proceedings more than satisfy the definition of a vexatious litigant under Code of Civil Procedure § 391, subd. (b)(1), as Plaintiff has unsuccessfully brought, in pro per, more than five litigations to an unfavorable final determination within the preceding seven years.

Plaintiff's arguments in opposition are unconvincing. Plaintiff contends that the restraining order denial in17SMRO00352 is more than seven years old. (Opposition at p. 13.) It is more than

seven years old in relation to the hearing on this motion, now set for April 29, 2025. But the time-frame for assessing prior litigations under Code of Civil Procedure § 391 is not the date of hearing on the motion but the date of the motion itself. (See Stolz v. Bank of America (1993) 15 Cal.App.4th 217, 224 ["[T]he filing of the motion establishes the point from which the seven-year period of section 391, subdivision (b)(1) must be retroactively measured."].) Thus the time frame for analysis is from November 20, 2017, seven years before the present motion was filed. This includes the denied restraining order noted above, in 17SMRO00352, Murrey v. Edwards.

In defense of the other cases, Plaintiff argues at length that his claims were brought in good faith and reasonably grounded. The argument from reasonableness is that multiple "psychotic" women he met on dating apps, motivated by "jealousy" and "feelings of rejection," became "obsessed" with him, and began to concoct false stories of abuse and other wrongdoing, publishing them to law enforcement and unscrupulous websites, the latter of which Plaintiff has discovered, in the course of his manifold litigations, are creatures of the military industrial complex. (Opposition at pp. 12–22.) Although his efforts have not resulted in uniform success, he claims that his failures are the product of judicial corruption and incompetence. (Opposition at pp. 23–27.) Plaintiff thus argues that, based on the underlying logic of his cases, he has not committed abuse of process or malicious prosecution, and no court has found he has done so. (Opposition at p. 27.)

Plaintiff's own characterization of his litigation history makes clear that he is a vexatious litigant. The vexatious litigant statutes are "designed to curb misuse of the court system by those persistent and obsessive litigants who, repeatedly litigating the same issues through groundless actions, waste the time and resources of the court system and other litigants." (Pittman v. Beck Park Apartments Ltd. (2018) 20 Cal.App.5th 1009, 1024.) That is what the cases described above demonstrate: a metastatic pattern of litigation, each iteration of which prompts new claims to be brought against new parties, inevitably by Plaintiff himself, with success diminishing even as the scope of his targets increases.

The present case is itself a creature of Plaintiff's prior cases, directed against women who interpreted or misinterpreted his history of litigation in advising other women of the potential

hazards of dating him. And when these women have attempted to defend themselves against his allegations, he has responded by attempting to expand the scope of his claims, both in this court and in other judicial fora, largely without success. This is vexatious conduct.

It is unnecessary for the party seeking a declaration of vexatious litigant status to demonstrate that any one case amounts to an abuse of process or malicious prosecution. It is sufficient that Plaintiff, without the guidance of counsel, has prosecuted such a high volume of cases to an unfavorable final outcome within the statutory timeframe. Plaintiff's excuse that he is surrounded by enemies and judicial incompetence is a common complaint of that class of persons to which Code of Civil Procedure § 391 applies.

Plaintiff is thus subject to a prefiling order under Code of Civil Procedure § 391.7, as Defendant seeks in her motion. (Motion at p. 16.)

In addition to any other relief provided in this title, the court may, on its own motion or the motion of any party, enter a prefiling order which prohibits a vexatious litigant from filing any new litigation in the courts of this state in propria persona without first obtaining leave of the presiding justice or presiding judge of the court where the litigation is proposed to be filed. Disobedience of the order by a vexatious litigant may be punished as a contempt of court.

(Code Civ. Proc., § 391.7, subd. (a).)

Defendant is not, however, entitled to an order requiring security from Plaintiff under Code of Civil Procedure §§ 391.1 and 391.3. (Motion at pp. 15–16.)

(a) In any litigation pending in any court of this state, at any time until final judgment is entered, a defendant may move the court, upon notice and hearing, for an order requiring the plaintiff to furnish security or for an order dismissing the litigation pursuant to subdivision (b) of Section 391.3. The motion for an order requiring the plaintiff to furnish security shall be based upon the ground, and, and supported by a showing, that the plaintiff is a vexatious litigant and that there is not a reasonable probability that they will prevail in the litigation against the moving defendant.

(Code Civ. Proc. § 391.1, subd. (a).)

(a) Except as provided in subdivision (b), if, after hearing the evidence upon the motion, the court determines that the plaintiff is a vexatious litigant and that there is no reasonable probability that the plaintiff will prevail in the litigation against the moving defendant, the court shall order the plaintiff to furnish, for the benefit of the moving defendant, security in such

amount and within such time as the court shall fix.

(Code Civ. Proc. § 391.3, subd. (a).)

Under the above authority, a determination that Plaintiff is a vexatious litigant is insufficient to support a requirement of security. The court must also find that Plaintiff lacks a reasonable probability of prevailing on the action. Although Defendant's anti-SLAPP motion has in large part been granted, Plaintiff has made a prima facie showing of the evidentiary viability of his defamation and false light claims. While this court is empowered to weigh the evidence in determining whether a reasonable probability of success exists under the above statute (See Moran v. Murtaugh Miller Meyer & Nelson, LLP (2007) 40 Cal.4th 780, 786), Defendant has not presented contrary evidence concerning the viability of Plaintiff's defamation claims.

Thus the motion is GRANTED, in part, and Plaintiff Stewart Lucas Murrey is declared a vexatious litigant subject to a pre-filing order under Code of Civil Procedure § 391.7. Defendant's request for an order requiring security is DENIED.

III. MOTION TO QUASH SERVICE OF SUMMONS

Code of Civil Procedure section 418.10, subd. (a)(1) states: "A defendant, on or before the last day of his or her time to plead or within any further time that the court may for good cause allow, may serve and file a notice of motion for one or more of the following purposes . . . (1) To quash service of summons on the ground of lack of jurisdiction of the court over him or her."

"'[C]ompliance with the statutory procedures for service of process is essential to establish personal jurisdiction." (Ellard v. Conway (2001) 94 Cal.App.4th 540, 544.) Mere notice of litigation does not confer personal jurisdiction absent substantial compliance with the statutory requirements for service of summons. (MJS Enterprises, Inc. v. Superior Court (1984) 153 Cal.App.3d 555, 557.)

While courts are not required to accept self-serving evidence — such as declarations that one was not served — submitted to support a motion to quash, facial defects of the proof of service will rebut its presumption of proper service. (American Exp. Centurion Bank, supra, 199 Cal.App.4th at p. 390.) The burden is on a plaintiff to prove facts showing that service was effective. (Summers v. McClanahan (2006) 140 Cal.App.4th 403, 413.)

Defendant Elmira Shariat's (Defendant) prior motion to quash service of summons was granted on May 29, 2024, on evidence presented by Defendant that she was neither present at nor a

resident of the Palms Springs address where Plaintiff Stewart Lucas Murrey (Plaintiff) attempted to accomplish personal service upon her.

Plaintiff thereafter obtained an order permitting service against Defendant by publication on September 10, 2025. However, Defendant contends that Plaintiff knew of the location of her mailing address at an Arcadia PO Box even as he sought service by publication, and has not attempted either substitute service or service by mail upon this address. (Shariat Decl. ¶ 3, Exh. A.)

A judge's decision to order service by publication "is to be regarded with the same effect as is his decision upon any other matter of fact submitted to his judicial determination." (Miller v. Superior Court In and For Los Angeles County (1961) 195 Cal.App.2d 779, 785.) But upon a motion to quash such service, the court is "bound only by that portion of the order for publication which had been correctly adjudicated and in disregarding the part thereof unsupported by evidence." (Ibid.)

To obtain service by publication, the party seeking service must show that "the party to be served cannot with reasonable diligence be served in another manner specified in this article." (Code Civ. Proc. § 415.50, subd. (a).) It has been held that where a plaintiff knows of a party's post-office box address, they may not obtain service by publication without first attempting service by mail upon that address. (See Transamerica Title Ins. Co. v. Hendrix (1995) 34 Cal.App.4th 740, 745.) A post office box may under certain circumstances also provide a place for the accomplishment of substitute service under Code of Civil Procedure § 415.20, subd. (c), and Government Code § 17538.5, subd. (d).

Plaintiff's application for service by publication did not indicate that all means of service other than publication had been exhausted, and thus the order for such service is properly quashed. Plaintiff's application for service by publication indicated that attempts had been made to personally serve Defendant at the PO box — i.e. to serve her while she was collecting her mail — and that he has mailed certain unspecified papers related to this lawsuit "by regular and certified mail" to the PO box. (9/5/2024 Murrey Decl. ¶¶ 12–15.) Plaintiff thus had not attempted service by mail with an accompanying notice and acknowledgement in accordance with Code of Civil Procedure § 415.30, nor substitute service upon the PO box (if applicable) under Code of Civil Procedure § 415.20, subd. (c) and Government Code § 17538, subd. (d).

Plaintiff in opposition presents photographs depicting a hand carrying the summons and other paperwork to what he contends is the PO box in question, along with the attestation that such papers were left at the address with an Asian man named "Jerry." (Murrey Decl. ¶ 5,. Exh. B.)

But Plaintiff does not authenticate the photographs or the service attempt, does not identify when this service took place, does not identify Jerry's capacity to accept service on Defendant's behalf, and does not indicate that service by mail was accomplished with a notice and acknowledgement as required by Code of Civil Procedure § 415.30, subd. (b).

The motion to quash is therefore GRANTED.

The Court has read and considered Plaintiff's RESPONSE TO ORDER TO SHOW CAUSE RE: SERVICE OF DEFENDANTS PURSUANT TO CRC Rule 3.110(b)(f).

After further review of the case, the Court orders and sets the following:

Stewart Lucas Murrey
- 1217 Wilshire Blvd 3655 Santa Monica CA 90403 is ordered to pay sanctions in the amount of $180.00 to the Superior Court of California, County of Los Angeles by 06/30/2025 pursuant to Code of Civil Procedure section 177.5 for For Failing to File Proof of Service as to Each Unserved Defendant Pursuant to CRC Rule 3.110(b)(f).

Failure to pay sanctions by the due date will result in this matter being forwarded to the Collections Division at 111 N. Hill Street, Room 616, Los Angeles, CA 90012 for referral to a private collections vendor without further notice or order of the Court.

Order to Show Cause Re: Why Bankruptcy Stay Should Not be Lifted as to Defendant Amy Blalock is scheduled for 07/25/2025 at 10:00 AM in Department 61 at Stanley Mosk Courthouse.

Order to Show Cause Re: Dismissal for Failure to Serve/Prosecute Pursuant to CCP Sections 583.410, 583.420(a)(1) and CRC Rule 3.110(b)and(f) is scheduled for 07/25/2025 at 10:00 AM in Department 61 at Stanley Mosk Courthouse.

On the Court's own motion, the Case Management Conference scheduled for 04/29/2025 is continued to 07/25/2025 at 10:00 AM in Department 61 at Stanley Mosk Courthouse.

The last declaration / status report filed in regards to the Defendant's bankruptcy status was filed on 02/10/2025. Defendant Amy Blalock is ordered to file a status report addressing the status of her bankruptcy with supplemental bankruptcy proceeding documentation. Said status report must be filed five (5) court days prior to 07/25/2025.

23STCV14890 April 29, 2025
STEWART LUCAS MURREY vs KELLY GIBBONS, et al. 10:00 AM

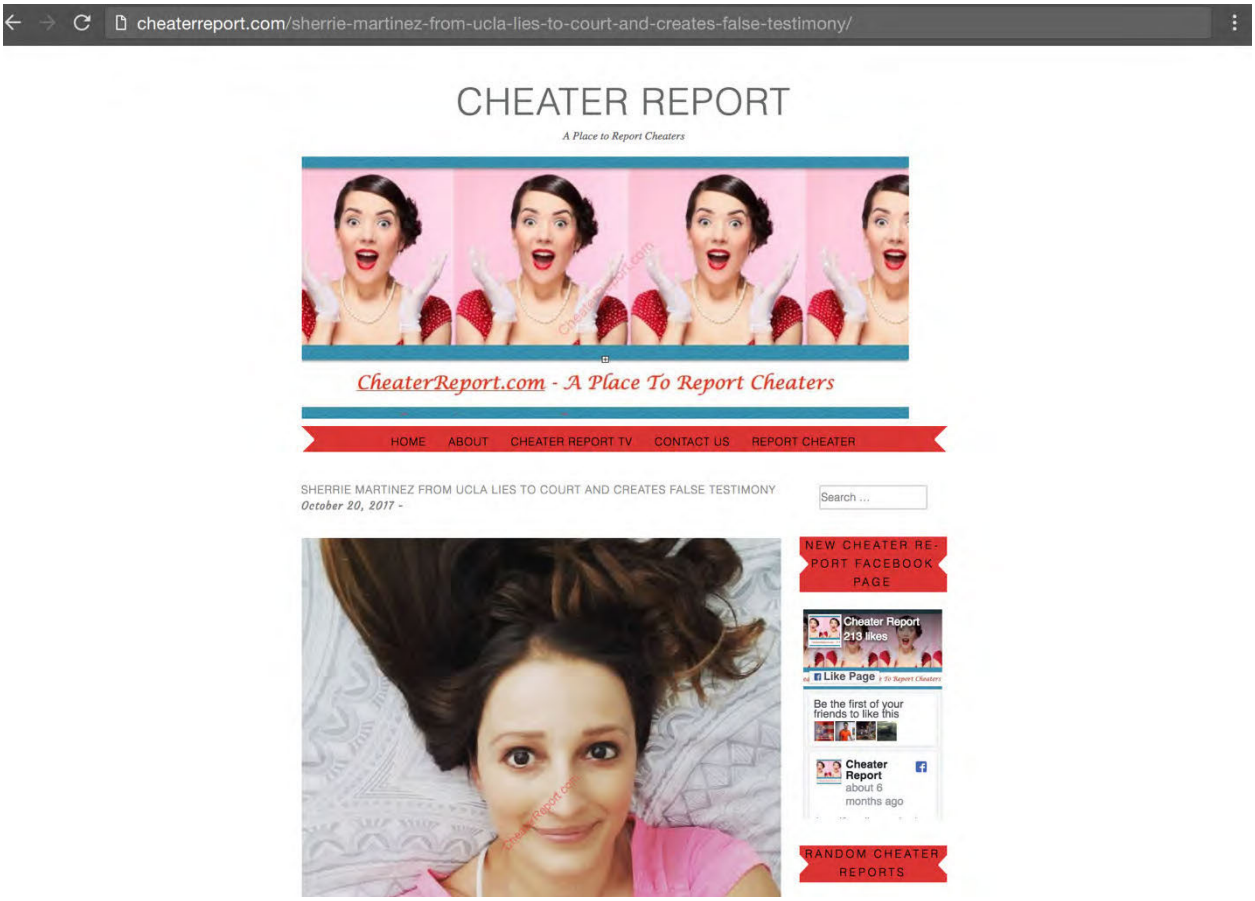
Judge: Honorable Lynne M. Hobbs
Judicial Assistant: Vanessa Trujillo
Courtroom Assistant: Diana De Leon
CSR: None
ERM: None
Deputy Sheriff: None

Clerk is to give notice.

Certificate of Mailing is attached.

Additional appearance for Defendant(s):
Lena Vanderford in Pro Per

EXHIBIT 3


cheaterreport.com/sherrie-martinez-from-ucla-lies-to-court-and-creates-false-testimony/
CHEATER REPORT
A Place to Report Cheaters
CheaterReport.com - A Place To Report Cheaters
HOME ABOUT CHEATER REPORT TV CONTACT US REPORT CHEATER
SHERRIE MARTINEZ FROM UCLA LIES TO COURT AND CREATES FALSE TESTIMONY
October 20, 2017 -
Search ...
NEW CHEATER REPORT FACEBOOK PAGE
Cheater Report
213 likes
Like Page
Be the first of your friends to like this
Cheater Report
about 6 months ago
RANDOM CHEATER REPORTS

Sherrie Martinez directly lied to the court system on 10/18/17. She included a false testimony about a young boy she doesn't know and his caretaker to the court system. She will also stop at nothing to defame and stalk other women, including going undercover and serving women papers of restraining orders that have been denied by the judge. It makes one wonder how she has time for this activity. Her behavior demonstrates that although she claims to have a degree in neuroscience and works in child and adolescent psychiatry at UCLA Ms. Martinez is weak in character, cannot think for herself, and knows nothing about true intelligence (or the court system). She must not know that blatantly write a false testimony for the court is a serious criminal offense of no small matter and she could be charged with perjury. She must also think that lying about Child Protective Services and investigations and claiming that a caretaker is using an 8-year-old to defame a man she is desperately trying to date is no small matter. Interesting for someone who claims to have a career in child psychiatry. I would check her credentials and see what else she does in her free time.

Sherrie Martinez directly lied to the court system on 10/18/17. She included a false testimony about a young boy she doesn't know and his caretaker to the court system. She will also stop at nothing to defame and stalk other women, including going undercover and serving women papers of restraining orders that have been denied by the judge. It makes one wonder how she has time for this activity. Her behavior demonstrates that although she claims to have a degree in neuroscience and works in child and adolescent psychiatry at UCLA Ms. Martinez is weak in character, cannot think for herself, and knows nothing about true intelligence (or the court system). She must not know that blatantly write a false testimony for the court is a serious criminal offense of no small matter and she could be charged with perjury. She must also think that lying about Child Protective Services and investigations and claiming that a caretaker is using an 8-year-old to defame a man she is desperately trying to date is no small matter. Interesting for someone who claims to have a career in child psychiatry. I would check her credentials and see what else she does in her free time.

Nicholas DeGeorge, Chicago IL

Mirhad Suljevic, Georgia

RECENT POSTS

Sherrie Martinez from UCLA lies to court and creates false testimony

Scam to get into the US

Edward Goldmann in Portland, Oregon is a womanizer

Ciro Aliperti, Medford Ny

Doris Falcone (Stankewitz), New Hampshire

RECENT COMMENTS

Anonymous on jill osier, Washington

Anonymous on jill osier, Washington

A New Way Of Business on Mark Edwards, Realpage, Inc, Carrollton TX

Crystal on Tam Larnerd bisexual cheater with whiskey dick

pam on Charlie Coletta, Atlanta, GA and China

CATEGORIES

Alabama

cheaterreport.com/sherrie-martinez-is-a-liar-and-phony-ucla-neuroscientist/

HOME ABOUT CHEATER REPORT TV CONTACT US REPORT CHEATER

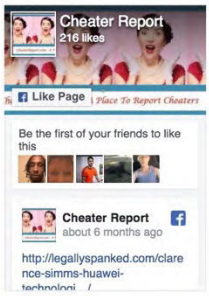
SHERRIE MARTINEZ IS A LIAR AND PHONY UCLA NEUROSCIENTIST

October 21, 2017 -

For a woman who pretends to have the best interest of children in mind, it's ironic that this phony ucla psychiatrist will blatantly and unabashedly lie to the court system about a child she doesn't know to manipulate a man whose affection she is desperately seeking to gain. Perhaps because she is too undesirable to attract a real man and incapable of having a child of

Search ...

NEW CHEATER REPORT FACEBOOK PAGE



RANDOM CHEATER REPORTS

Tamar Edwards 36 Yr Old Prostitute in Northern California under "Shocktiva"

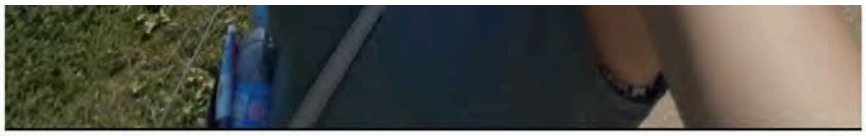
DOUGLAS 'THE DOG' HOLBERGER & HIS BEST FRIEND KENNETH SUTHERLAND!

Sandyia

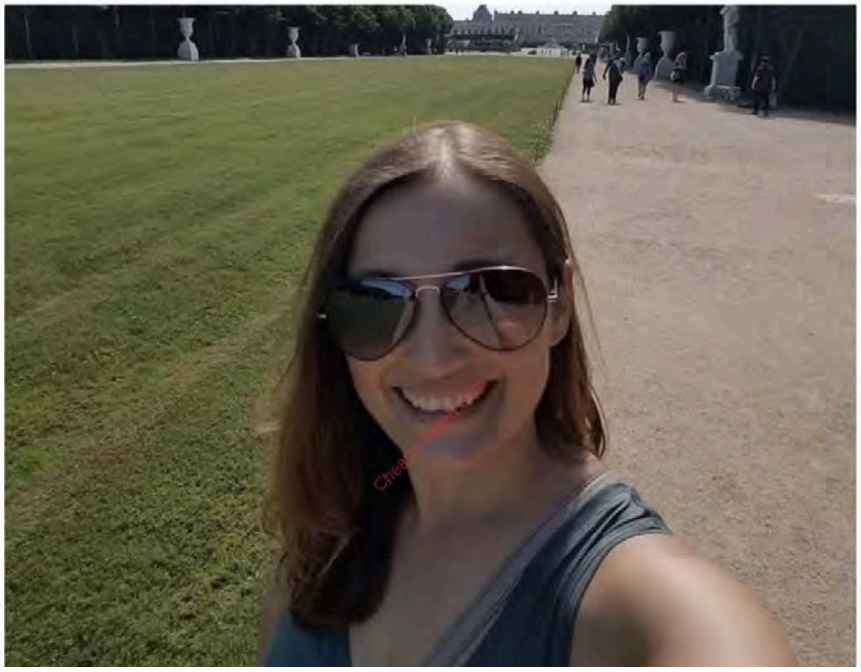
Chris Mcmillan, Texas

Brett Norem, North Carolina

For a woman who pretends to have the best interest of children in mind, it's ironic that this phony ucla psychiatrist will blatantly and unabashedly lie to the court system about a child she doesn't know to manipulate a man whose affection she is desperately seeking to gain. Perhaps because she is too undesirable to attract a real man and incapable of having a child of her own, she'll do whatever it takes to impress in a desperate attempt to hang on to whatever might be left of her dwindling childbearing years.
Sherrie Martinez makes false statements to the court about people she doesn't know without solid research or information. For someone whose field relies heavily on research, she should probably quit her corrupt academic administrative job and find a new profession, perhaps a sleazy process server ? Like Sherrie, process servers are immoral scum and usually lacking in the looks department. It will suit her well.



For a woman who pretends to have the best interest of children in mind, it's ironic that this phony ucla psychiatrist will blatantly and unabashedly lie to the court system about a child she doesn't know to manipulate a man whose affection she is desperately seeking to gain. Perhaps because she is too undesirable to attract a real man and incapable of having a child of her own, she'll do whatever it takes to impress in a desperate attempt to hang on to whatever might be left of her dwindling childbearing years.
Sherrie Martinez makes false statements to the court about people she doesn't know without solid research or information. For someone whose field relies heavily on research, she should probably quit her corrupt academic administrative job and find a new profession, perhaps a sleazy process server ? Like Sherrie, process servers are immoral scum and usually lacking in the looks department. It will suit her well.



FRIEND KENI
SUTHERLA
Sandyia
Chris Mcmillan
Brett Norem, North Carc

RECENT POST

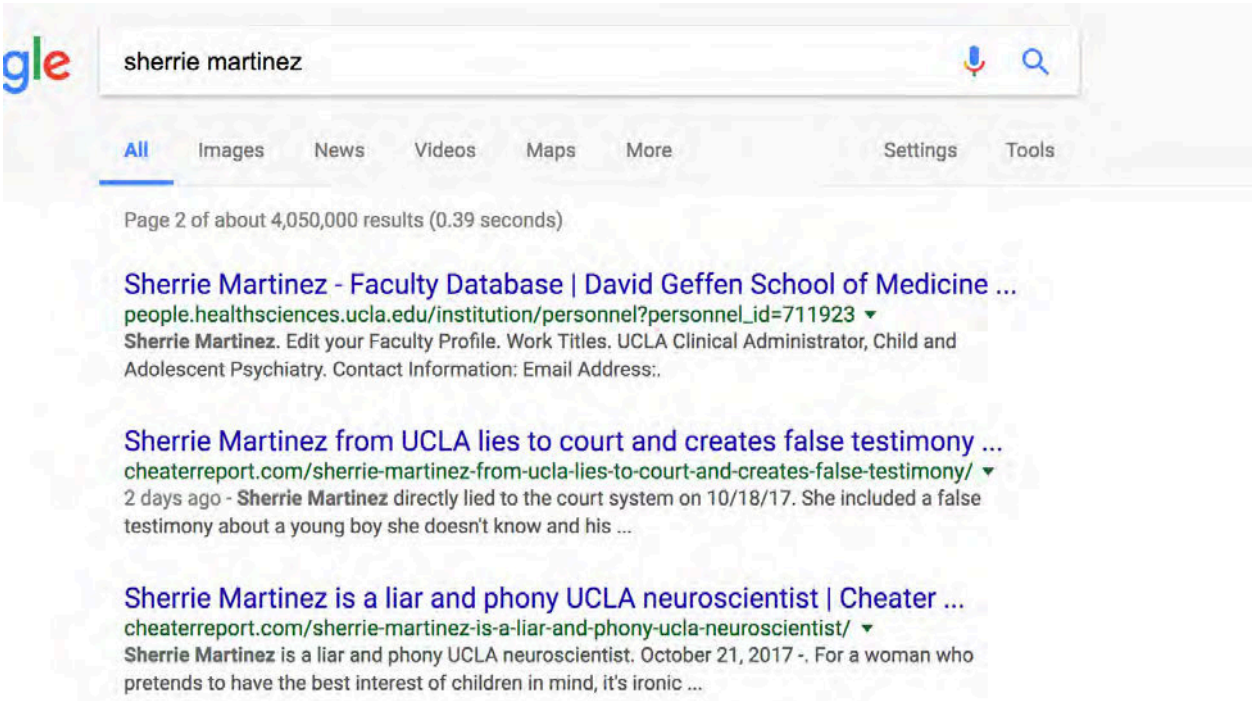
Autmn Delahoussay
Philip D Welch jr., Tex
Charles Aaron Lehnhoff,
Tommas Campbell, New
BE CAREFUL HE IS A STA

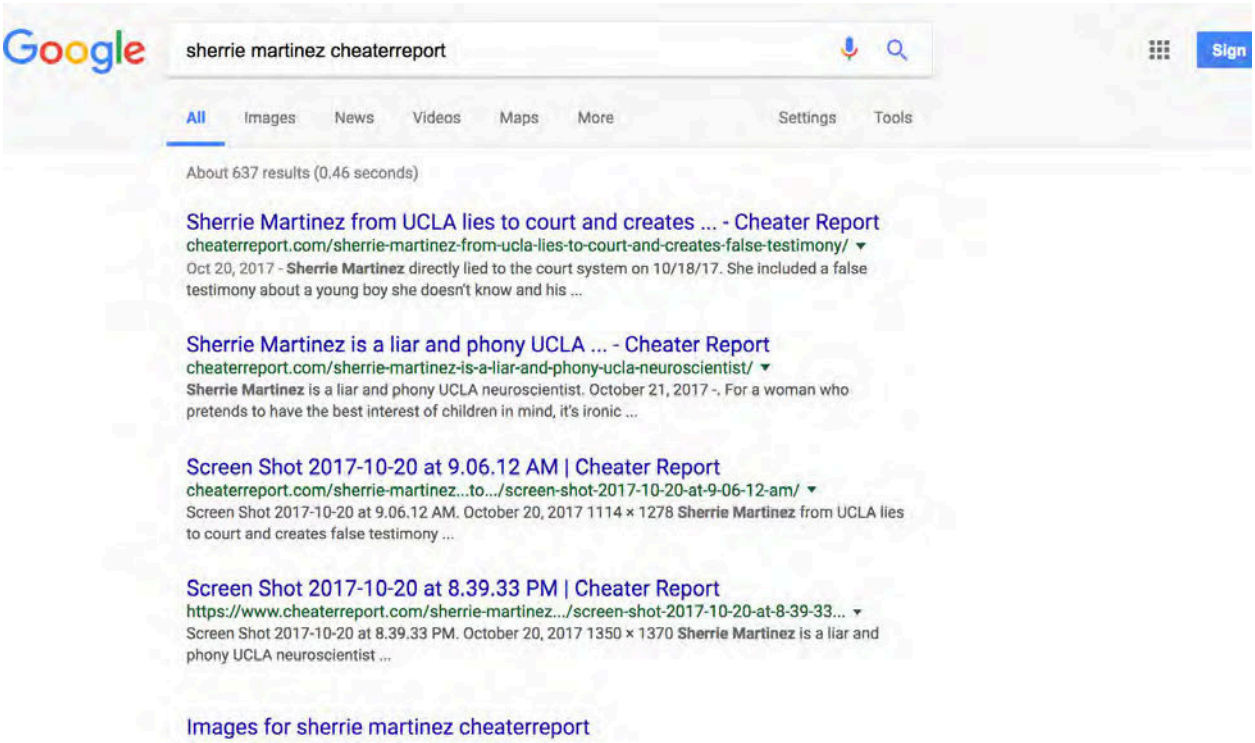
RECENT COMME

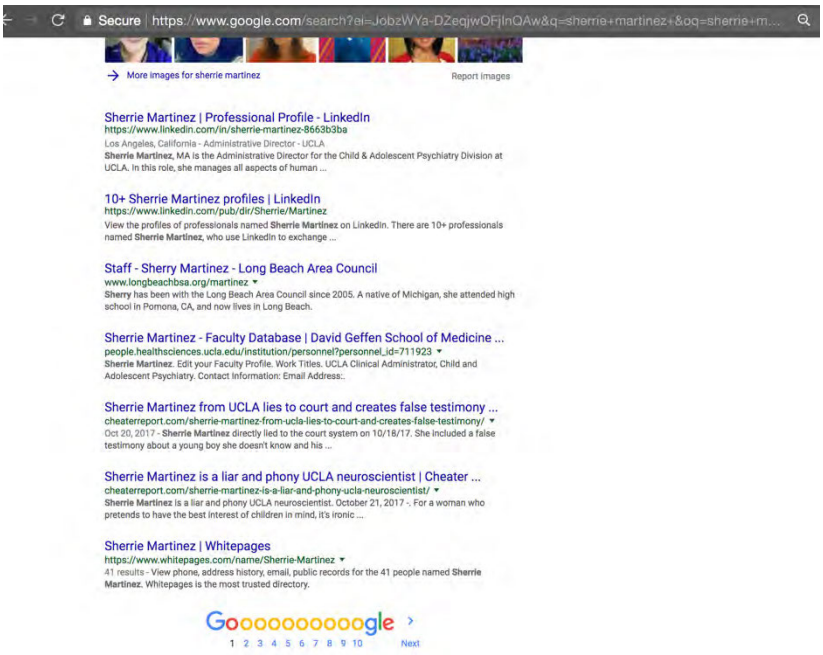
Amanda on Amanda Ala
Guatemala City
Anonymous on jill osier, Was
Anonymous on jill osier, Was
.. on BE CAREFUL HE IS A S
.. on Tommas Campbell, Ne

CATEGORIES

Alabama
Angola
Arizona
Arkansas
Australia
Brazil
Business
California
Canada
Celebrity
Cheater Report TV
China


gle
sherrie martinez
All
Images
News
Videos
Maps
More
Settings
Tools
Page 2 of about 4,050,000 results (0.39 seconds)
Sherrie Martinez - Faculty Database | David Geffen School of Medicine ...
people.healthsciences.ucla.edu/institution/personnel?personnel_id=711923
Sherrie Martinez. Edit your Faculty Profile. Work Titles. UCLA Clinical Administrator, Child and Adolescent Psychiatry. Contact Information: Email Address:.
Sherrie Martinez from UCLA lies to court and creates false testimony ...
cheaterreport.com/sherrie-martinez-from-ucla-lies-to-court-and-creates-false-testimony/
2 days ago - Sherrie Martinez directly lied to the court system on 10/18/17. She included a false testimony about a young boy she doesn't know and his ...
Sherrie Martinez is a liar and phony UCLA neuroscientist | Cheater ...
cheaterreport.com/sherrie-martinez-is-a-liar-and-phony-ucla-neuroscientist/
Sherrie Martinez is a liar and phony UCLA neuroscientist. October 21, 2017 -. For a woman who pretends to have the best interest of children in mind, it's ironic ...


Google
sherrie martinez cheaterreport
Sign
All
Images
News
Videos
Maps
More
Settings
Tools
About 637 results (0.46 seconds)
Sherrie Martinez from UCLA lies to court and creates ... - Cheater Report
cheaterreport.com/sherrie-martinez-from-ucla-lies-to-court-and-creates-false-testimony/
Oct 20, 2017 - Sherrie Martinez directly lied to the court system on 10/18/17. She included a false testimony about a young boy she doesn't know and his ...
Sherrie Martinez is a liar and phony UCLA ... - Cheater Report
cheaterreport.com/sherrie-martinez-is-a-liar-and-phony-ucla-neuroscientist/
Sherrie Martinez is a liar and phony UCLA neuroscientist. October 21, 2017 -. For a woman who pretends to have the best interest of children in mind, it's ironic ...
Screen Shot 2017-10-20 at 9.06.12 AM | Cheater Report
cheaterreport.com/sherrie-martinez...to.../screen-shot-2017-10-20-at-9-06-12-am/
Screen Shot 2017-10-20 at 9.06.12 AM. October 20, 2017 1114 × 1278 Sherrie Martinez from UCLA lies to court and creates false testimony ...
Screen Shot 2017-10-20 at 8.39.33 PM | Cheater Report
https://www.cheaterreport.com/sherrie-martinez.../screen-shot-2017-10-20-at-8-39-33...
Screen Shot 2017-10-20 at 8.39.33 PM. October 20, 2017 1350 × 1370 Sherrie Martinez is a liar and phony UCLA neuroscientist ...
Images for sherrie martinez cheaterreport


Secure | https://www.google.com/search?ei=JobzWYa-DZeqjwOFjInQAw&q=sherrie+martinez+&oq=sherrie+m...
More images for sherrie martinez
Report images
Sherrie Martinez | Professional Profile - LinkedIn
https://www.linkedin.com/in/sherrie-martinez-8663b3ba
Los Angeles, California - Administrative Director - UCLA
Sherrie Martinez, MA is the Administrative Director for the Child & Adolescent Psychiatry Division at UCLA. In this role, she manages all aspects of human ...
10+ Sherrie Martinez profiles | LinkedIn
https://www.linkedin.com/pub/dir/Sherrie/Martinez
View the profiles of professionals named Sherrie Martinez on LinkedIn. There are 10+ professionals named Sherrie Martinez, who use LinkedIn to exchange ...
Staff - Sherry Martinez - Long Beach Area Council
www.longbeachbsa.org/martinez
Sherry has been with the Long Beach Area Council since 2005. A native of Michigan, she attended high school in Pomona, CA, and now lives in Long Beach.
Sherrie Martinez - Faculty Database | David Geffen School of Medicine ...
people.healthsciences.ucla.edu/institution/personnel?personnel_id=711923
Sherrie Martinez. Edit your Faculty Profile. Work Titles. UCLA Clinical Administrator, Child and Adolescent Psychiatry. Contact Information: Email Address:.
Sherrie Martinez from UCLA lies to court and creates false testimony ...
cheaterreport.com/sherrie-martinez-from-ucla-lies-to-court-and-creates-false-testimony/
Oct 20, 2017 - Sherrie Martinez directly lied to the court system on 10/18/17. She included a false testimony about a young boy she doesn't know and his ...
Sherrie Martinez is a liar and phony UCLA neuroscientist | Cheater ...
cheaterreport.com/sherrie-martinez-is-a-liar-and-phony-ucla-neuroscientist/
Sherrie Martinez is a liar and phony UCLA neuroscientist. October 21, 2017 -. For a woman who pretends to have the best interest of children in mind, it's ironic ...
Sherrie Martinez | Whitepages
https://www.whitepages.com/name/Sherrie-Martinez
41 results - View phone, address history, email, public records for the 41 people named Sherrie Martinez. Whitepages is the most trusted directory.
Goooooooooogle
1 2 3 4 5 6 7 8 9 10 Next

Staff - Sherry Martinez - Long Beach Area Council
www.longbeachbsa.org/martinez
Sherry has been with the Long Beach Area Council since 2005. A native of Michigan, she attended high school in Pomona, CA, and now lives in Long Beach.

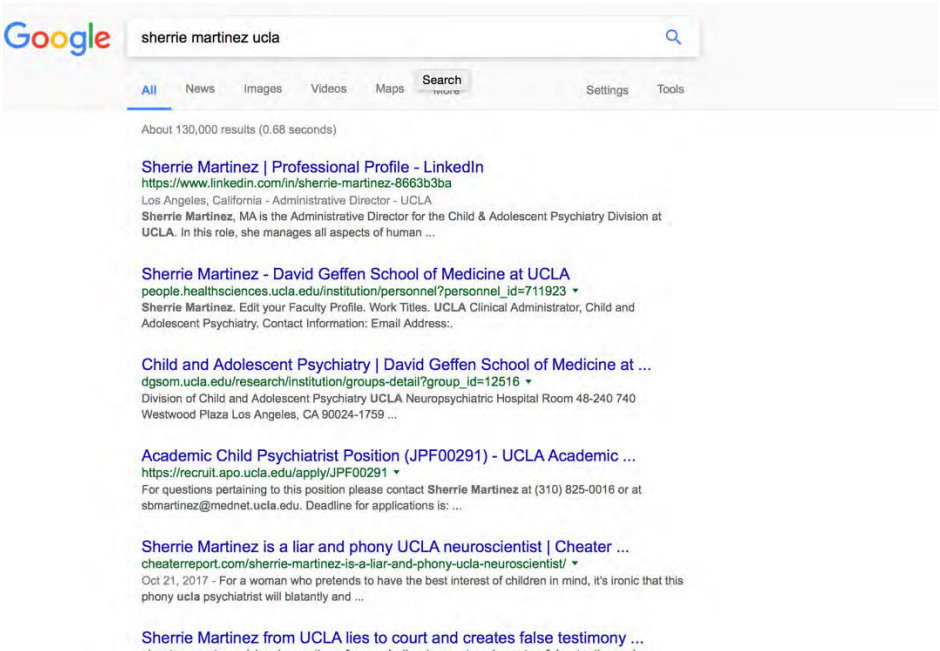
10+ Sherrie Martinez profiles | LinkedIn
https://www.linkedin.com/pub/dir/Sherrie/Martinez
View the profiles of professionals named **Sherrie Martinez** on LinkedIn. There are 10+ professionals named **Sherrie Martinez**, who use LinkedIn to exchange ...

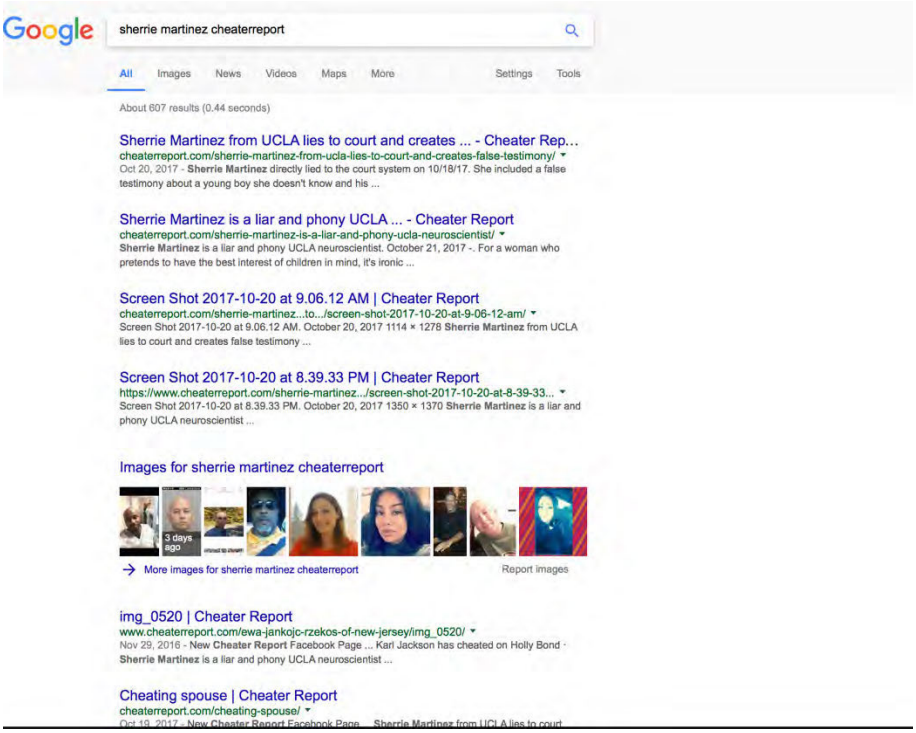
Sherrie Martinez | Professional Profile - LinkedIn
https://www.linkedin.com/in/sherrie-martinez-8663b3ba
Los Angeles, California - Administrative Director - UCLA
Sherrie Martinez, MA is the Administrative Director for the Child & Adolescent Psychiatry Division at UCLA. In this role, she manages all aspects of human ...

Sherrie Martinez | Whitepages
https://www.whitepages.com/name/Sherrie-Martinez
41 results - View phone, address history, email, public records for the 41 people named **Sherrie Martinez**. Whitepages is the most trusted directory.

Sherrie Martinez from UCLA lies to court and creates false testimony ...
cheaterreport.com/sherrie-martinez-from-ucla-lies-to-court-and-creates-false-testimony/
Oct 20, 2017 - **Sherrie Martinez** directly lied to the court system on 10/18/17. She included a false testimony about a young boy she doesn't know and his ...

Goooooooooogle
1 2 3 4 5 6 7 8 9 10 Next


Google
sherrie martinez ucla
All
News
Images
Videos
Maps
Search
Settings
Tools
About 130,000 results (0.68 seconds)
Sherrie Martinez | Professional Profile - LinkedIn
https://www.linkedin.com/in/sherrie-martinez-8663b3ba
Los Angeles, California - Administrative Director - UCLA
Sherrie Martinez, MA is the Administrative Director for the Child & Adolescent Psychiatry Division at UCLA. In this role, she manages all aspects of human ...
Sherrie Martinez - David Geffen School of Medicine at UCLA
people.healthsciences.ucla.edu/institution/personnel?personnel_id=711923
Sherrie Martinez. Edit your Faculty Profile. Work Titles. UCLA Clinical Administrator, Child and Adolescent Psychiatry. Contact Information: Email Address:.
Child and Adolescent Psychiatry | David Geffen School of Medicine at ...
dgsom.ucla.edu/research/institution/groups-detail?group_id=12516
Division of Child and Adolescent Psychiatry UCLA Neuropsychiatric Hospital Room 48-240 740 Westwood Plaza Los Angeles, CA 90024-1759 ...
Academic Child Psychiatrist Position (JPF00291) - UCLA Academic ...
https://recruit.apo.ucla.edu/apply/JPF00291
For questions pertaining to this position please contact Sherrie Martinez at (310) 825-0016 or at sbmartinez@mednet.ucla.edu. Deadline for applications is: ...
Sherrie Martinez is a liar and phony UCLA neuroscientist | Cheater ...
cheaterreport.com/sherrie-martinez-is-a-liar-and-phony-ucla-neuroscientist/
Oct 21, 2017 - For a woman who pretends to have the best interest of children in mind, it's ironic that this phony ucla psychiatrist will blatantly and ...
Sherrie Martinez from UCLA lies to court and creates false testimony ...
cheaterreport.com/sherrie-martinez-from-ucla-lies-to-court-and-creates-false-testimony/
Oct 20, 2017 - Sherrie Martinez directly lied to the court system on 10/18/17. She included a false testimony about a young boy she doesn't know and his ...


Google
sherrie martinez cheaterreport
All
Images
News
Videos
Maps
More
Settings
Tools
About 607 results (0.44 seconds)
Sherrie Martinez from UCLA lies to court and creates ... - Cheater Rep...
cheaterreport.com/sherrie-martinez-from-ucla-lies-to-court-and-creates-false-testimony/
Oct 20, 2017 - Sherrie Martinez directly lied to the court system on 10/18/17. She included a false testimony about a young boy she doesn't know and his ...
Sherrie Martinez is a liar and phony UCLA ... - Cheater Report
cheaterreport.com/sherrie-martinez-is-a-liar-and-phony-ucla-neuroscientist/
Sherrie Martinez is a liar and phony UCLA neuroscientist. October 21, 2017 -. For a woman who pretends to have the best interest of children in mind, it's ironic ...
Screen Shot 2017-10-20 at 9.06.12 AM | Cheater Report
cheaterreport.com/sherrie-martinez...to.../screen-shot-2017-10-20-at-9-06-12-am/
Screen Shot 2017-10-20 at 9.06.12 AM. October 20, 2017 1114 × 1278 Sherrie Martinez from UCLA lies to court and creates false testimony ...
Screen Shot 2017-10-20 at 8.39.33 PM | Cheater Report
https://www.cheaterreport.com/sherrie-martinez.../screen-shot-2017-10-20-at-8-39-33...
Screen Shot 2017-10-20 at 8.39.33 PM. October 20, 2017 1350 × 1370 Sherrie Martinez is a liar and phony UCLA neuroscientist ...
Images for sherrie martinez cheaterreport
3 days ago
More images for sherrie martinez cheaterreport
Report images
img_0520 | Cheater Report
www.cheaterreport.com/ewa-jankojc-rzekos-of-new-jersey/img_0520/
Nov 29, 2016 - New Cheater Report Facebook Page ... Karl Jackson has cheated on Holly Bond · Sherrie Martinez is a liar and phony UCLA neuroscientist ...
Cheating spouse | Cheater Report
cheaterreport.com/cheating-spouse/
Oct 19, 2017 - New Cheater Report Facebook Page ... Sherrie Martinez from UCLA lies to court

20 December 2016

Lucas Murrey, California | Cheater Report

https://cheaterreport.com/lucas-murrey-california-2/

Dec 20, 2016 - **Lucas Murrey**, total con artist. Lives in Los Angeles - all women beware!! He will come off at first as a great man in a difficult situation and is oh ...

Posted

Lucas Murrey, total con artist. Lives in Los Angeles – all women beware!! He will come off at first as a great man in a difficult situation and is oh so charming…but he is a pathological liar and cheater. He has no empathy for the other people in his life and will treat anyone like dirt once they aren't of use for him. Huge narcissist. Only cares how you make him appear to others on outside. Will engage in relationships with multiple women at the same time and lie to all of them and say that he's in an exclusive

Secure https://www.cheaterreport.com/lucas-murrey-sociopathe-from-yale/

LUCAS MURREY SOCIOPATHE FROM YALE

January 21, 2012

Search ...

NEW CHEATER REPORT FACEBOOK PAGE

Be the first of your friends to like this

Cheater Report
feeling blessed
March 24 at 8:58pm

You can always count on cheaterreport.com to always be there as the top site to report

RANDOM CHEATER REPORTS

GARY BEEBE FROM LINCOLN, CA

MO Rep Donald Gosel

Google lucas murrey

Sign In

All News Images Videos Shopping More Settings Tools

About 139,000 results (0.57 seconds)

Amazon.com: Lucas Murrey: Books, Biography, Blog, Audiobooks ...

https://www.amazon.com/Lucas-Murrey/e/B00M6SNPBA

Visit Amazon.com's **Lucas Murrey** Page and shop for all **Lucas Murrey** books and other **Lucas Murrey** ... See search results for author "**Lucas Murrey**" in Books ...

Nietzsche: The Meaning of Earth Hardcover - Amazon.com

https://www.amazon.com/Nietzsche-Meaning-Earth-Lucas-Murrey/dp/1611461545

In this book, author **Lucas Murrey** argues that the thinking of the modern German philosopher Friedrich Nietzsche (1944–1900) is not only more grounded in ...

Images for lucas murrey

More images for lucas murrey

Report images

Lucas Murrey, California | Cheater Report

https://cheaterreport.com/lucas-murrey-california-2/

Dec 20, 2016 - **Lucas Murrey**, total con artist. Lives in Los Angeles - all women beware!! He will come off at first as a great man in a difficult situation and is oh ...

Cheater Report - The Place to Report a Cheater - Part 8

cheaterreport.com › page

Random Cheater Reports. David Bracht is a cheater · LUCAS MURREY ONLINE PREDATOR AND WOMEN MANIPULATOR, California · Gold digger!! Gold digger!! Elise Brown of Knoxville TN ...

Gold digger!! | Cheater Report

cheaterreport.com › gold-digger

Feb 19, 2017 · Canada; Aurora on LUCAS MURREY ONLINE PREDATOR AND WOMEN MANIPULATOR, California; Anonymous on jill osier, Washington; Aurora on LUCAS MURREY ...

JANE DOE

September 21, 2017 at 17:10 Reply

I unfortunately had the same experience. He is definitley a Liar, Con artist and mentally disturbed. I am oozing with regrets.

JEN PARKER

September 21, 2017 at 20:52 Reply

The cad without his (probably fake) glasses.

Internet Reputation Control, Inc.
U.S.A

INVOICE

 # INV-000018

Balance Due
$0.00

Invoice Date :	20 Oct 2017
Terms :	Due on Receipt
Due Date :	20 Oct 2017

Bill To
Sherrie Martinez

#	Item & Description	Qty	Rate	Amount
1	Professional Services (CR Package)	1.00	399.00	399.00
			Sub Total	399.00
			Total	**$399.00**
			Payment Made	(-) 399.00
			Balance Due	**$0.00**

Notes

Thank you for your payment. We look forward to assisting you.

Terms & Conditions

Once payment is received, we will begin work. No refunds unless we confirm to you via email that we can't handle your case. Thank you for your business and with trusting us.

Transaction Information

Merchant	Brand-Yourself.com
Amount	**$399.99 USD**
Transaction Date	Jun 09 2017, 06:47 AM EDT
Authorization Code	184279
Status	Settled

Payment Information

Payment Type	Credit Card
Card Type	MasterCard
Cardholder Name	
Credit Card Ends With	3142

Customer Information

Name	Lucas Murrey
Billing Address	19803

SEPTEMBER 9, 2017 · OPINION · BY IAN LEAF

AARON MINC ON THE STARK DIFFERENCES IN US AND EU INTERNET PRIVACY LAW

interviews (this one explains Android malware issues, we performed a mobile forensic analysis of these malicious

You may find other recent media appearances by Domingo J. Rivera of AVM Technology here.

You may navigate our site for additional information about our services, which include:

- Information Security Consulting
- Computer Forensics

FENTON LAW GROUP, LLP
Nicholas D. Jurkowitz (SBN 261283)
njurkowitz@fentonlawgroup.com
1990 S. Bundy Drive # 777
Los Angeles, CA 90025
Phone 310-444-5244
Fax 310-444-5280

Attorneys for Specially Appearing Defendants Domingo J. Rivera; Domingo J. Rivera, Attorney at Law, PLC; Internet Reputation Control, Inc.; and PRVT LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

STEWART LUCAS MURREY, Plaintiff, v. AARON MINC, et al., Defendants.	CASE NO. 2:20-cv-06217-PA Hon. Percy Anderson SPECIALLY APPEARING DEFENDANTS DOMINGO J RIVERA, DOMINGO J RIVERA, ATTORNEY AT LAW PLC, INTERNET REPUTATION CONTROL, INC., AND PRVT LLC'S REPLY IN RESPONSE TO OPPOSITION TO MOTION TO DISMISS; SECOND DECLARATION OF DOMINGO J. RIVERA Hearing Date: December 21, 2020 Hearing Time: 1:30 p.m. Courtroom: 10A

SECOND DECLARATION OF DOMINGO J. RIVERA

I, Domingo J. Rivera, being first duly sworn, affirm and state under penalty of perjury the following:

1. My name is Domingo J. Rivera. This affidavit is based upon my personal knowledge.

2. I started the law firm Domingo J. Rivera, Attorney At Law, PLC in September of 2007 as a duly registered Virginia law firm. Until on or about 2015, Rivera PLC handled a large volume of retained and court-appointed State and Federal civil and criminal litigation. Rivera PLC appeared in various forums, including the Virginia Circuit Courts, the Virginia Supreme Court, the United States District Court for the Eastern and Western Districts of Virginia, as well as Federal District Courts in other States, such as Arkansas, Texas, and Florida. I am also admitted to practice law before the United States Patent and Trademark Office (PTO). I am currently employed as Senior Cyber Security Counsel for a large U.K.-based publicly traded technology company registered as a Delaware LLC.

3. Rivera PLC was not set up to facilitate paid removals from any website, rarely negotiated paid removals from any websites, and was never retained to effect any paid removals from cheaterreport.com.

4. In addition to the practice of law, I have been qualified and admitted by various Courts as an expert witness in the fields of computer forensics and cyber security in over 26 civil and criminal cases and a large number of consulting engagements. In addition to my Juris Doctor degree, I have a Bachelor's Degree in Computer Engineering, a Master of Science in Information Technology, a Master of Business Administration, a Master of Law (Ll.M.) in Business Transactions, and am currently pursuing a PhD in Engineering. I spent

approximately 7 years as an Active Duty Officer in the United States Navy and also formerly was a Federal civilian employee working as a Information Security Specialist for the United States Marine Corps Network Operations and Security Center, and for many years held a Top Secret/SCI Security Clearance. I was also formerly employed as an Information Security Consultant at one of the largest banks in the United States.

5. I have received extensive cyber security training from various institutions, including the DOD's Defense Cyber Investigations Training Academy and the SANS Institute, where I am qualified as an instructor. I hold several industry cyber security certifications, such as Certified Information Systems Security Professional (CISSP), Certified Ethical Hacker (CEH), Certified Network Penetration Tester (GPEN), Certified Incident Handler (GCIH), and Certified Forensic Examiner (GCFE).

6. As a result of my experience and qualifications, I have been interviewed by various news organizations, including the Richmond, Virginia local station NBC 12. One of these interviews was intended to educate the Richmond, Virginia local audience about the dangers of ransomware. Contrary to Murrey's assertions (Dkt. #40), I did not advocate in favor of ransomware or any other scams. The NBC 12 On Your Side interview speaks for itself and could be accessed at:https://www.youtube.com/watch?v=RtcyOigKQYg.

7. Cloudflare, Inc is a Delaware Corporation, as such it registered in California as a foreign corporation. See Exhibit A, containing a true and accurate copy of documents retrieved from the California Secretary of State's official website. Although Cloudflare has its principal executive office in California, according to Cloudflare's own publicly available information, the Cloudflare network operates through data centers located in over 200 different cities. See Exhibit B, a true and accurate copy of Cloudflare's network map,

file Motions to Dismiss in abundance of caution. I promptly emailed Murrey to meet and confer regarding these motions and requesting to have a call with Murrey. On the same day, I received an email from Murrey proposing meet and confer dates that were over a week away and fell during the Thanksgiving Holiday weekend. See Exhibit C. I responded to Murrey's email but never, to this date, received a reply from Murrey. See Exhibit D. Given that Murrey was requesting dates over a week away, during a Holiday weekend, and far after the time when Murrey alleged the Motions were due and in consideration of Murrey's intimation of filing requests for defaults, we made the decision to file the Motions to Dismiss (Dkt #s 26-30).

I, Domingo J. Rivera declare under penalty of perjury under the Laws of the United States that the foregoing is true and correct. Executed on December 9, 2020.

___/s/_Domingo J. Rivera___
Domingo J. Rivera

17-12-19 00:27:40.968227+00	new_email:admin@prvtdomains.com, old_email:dir@infosecusa.com
17-03-31 18:56:22.716171+00	user_email:admin@prvtdomains.com

User ID:	Method of Payment:	Status:	First Name:	Last Name:	Company:	Address1:	Address2:	City:	State:	Zip:	Country:
9241115	BF	Active	PRVT	LLC		220 Calle Manuel Domenech	Unit #631	San Juan	PR	918	US

State Corporation Commission
Clerk's Information System

Entity Information

Entity Information

Entity Name: Internet Reputation Control, Inc.
Entity Type: Nonstock Corporation
Formation Date: 05/16/2008
VA Qualification Date: 05/16/2008
Industry Code: 0 - General
Jurisdiction: VA
Registration Fee Due Date: Not Required

Entity ID: 06948525
Entity Status: Inactive
Reason for Status: Auto Terminated - Annual Report and/or Fees - Can Reinstate
Status Date: 09/30/2018
Period of Duration: Perpetual
Annual Report Due Date: 05/31/2018
Charter Fee: $50.00

Registered Agent Information

RA Type: Individual
RA Qualification: Officer of the Corporation
Name: DOMINGO JUAN RIVERA

Locality: LOUDOUN COUNTY

Registered Office Address: 23422 ROSLINDALE DR, ASHBURN, VA, 20147 - 0000, USA

Principal Office Address

Address: 1390 CHAIN BRIDGE RD., #10042,
MCLEAN, VA, 22101 - 0000, USA

Corporations and Entities
Search
Create / Authorize
Amend
Dissolve / Withdraw
Convert
Merge / Consolidate
Restore
Reserve Name
Create Account

Annual Filings
2020 Annual Report
2020 Annual Report Extension
2020 LLC Fees
LLP Renewal
Prior Years

Certificates
Order Good Standing
Order Existence
Validate

CORPORATION INFORMATION

PRVT L.L.C.

Return to Search Results

I want to: Select Next

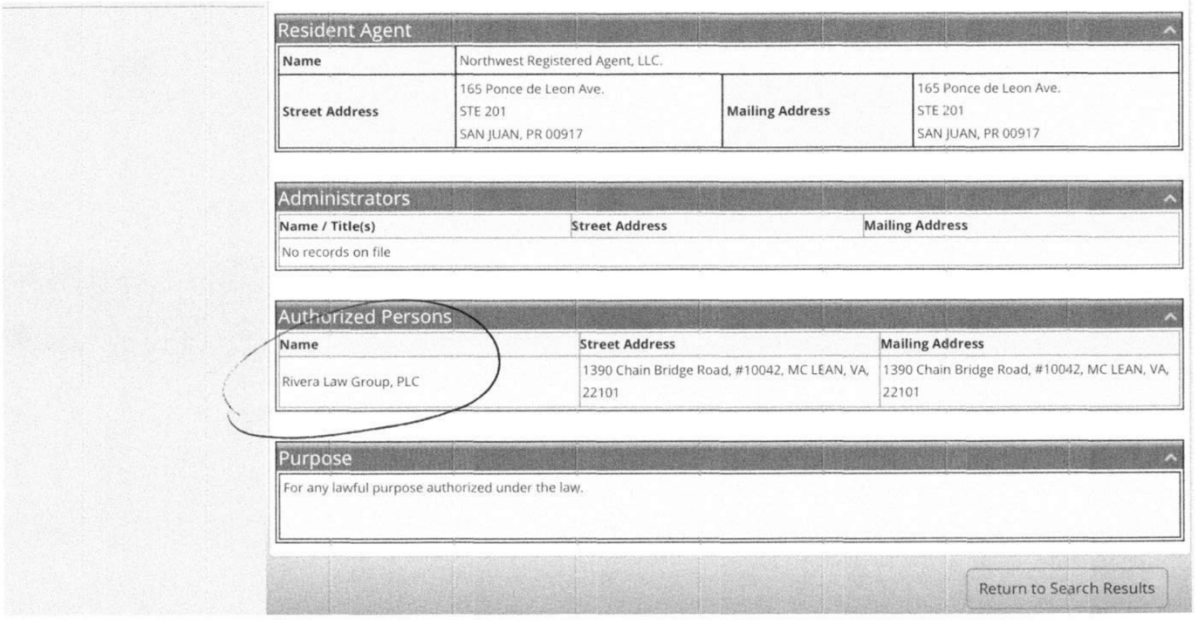
Details | Articles | Annual Filings | Certificates

General Information

Name	PRVT L.L.C.		
Register No.	402490	Status	ACTIVE
Formation Date	17-Dec-2017 1:20 AM	Effective Date	17-Dec-2017 1:20 AM
Expiration Date	Does not expire		
Class	Limited Liability Company		
Type	For Profit	Jurisdiction	Domestic

Designated Office Address

Street Address	165 Ponce de Leon Ave. STE 201 SAN JUAN, PR 00917	Mailing Address	1390 Chain Bridge Rd #10042 MC LEAN, VA 22101



Resident Agent

Name	Northwest Registered Agent, LLC.		
Street Address	165 Ponce de Leon Ave. STE 201 SAN JUAN, PR 00917	Mailing Address	165 Ponce de Leon Ave. STE 201 SAN JUAN, PR 00917

Administrators

Name / Title(s)	Street Address	Mailing Address
No records on file		

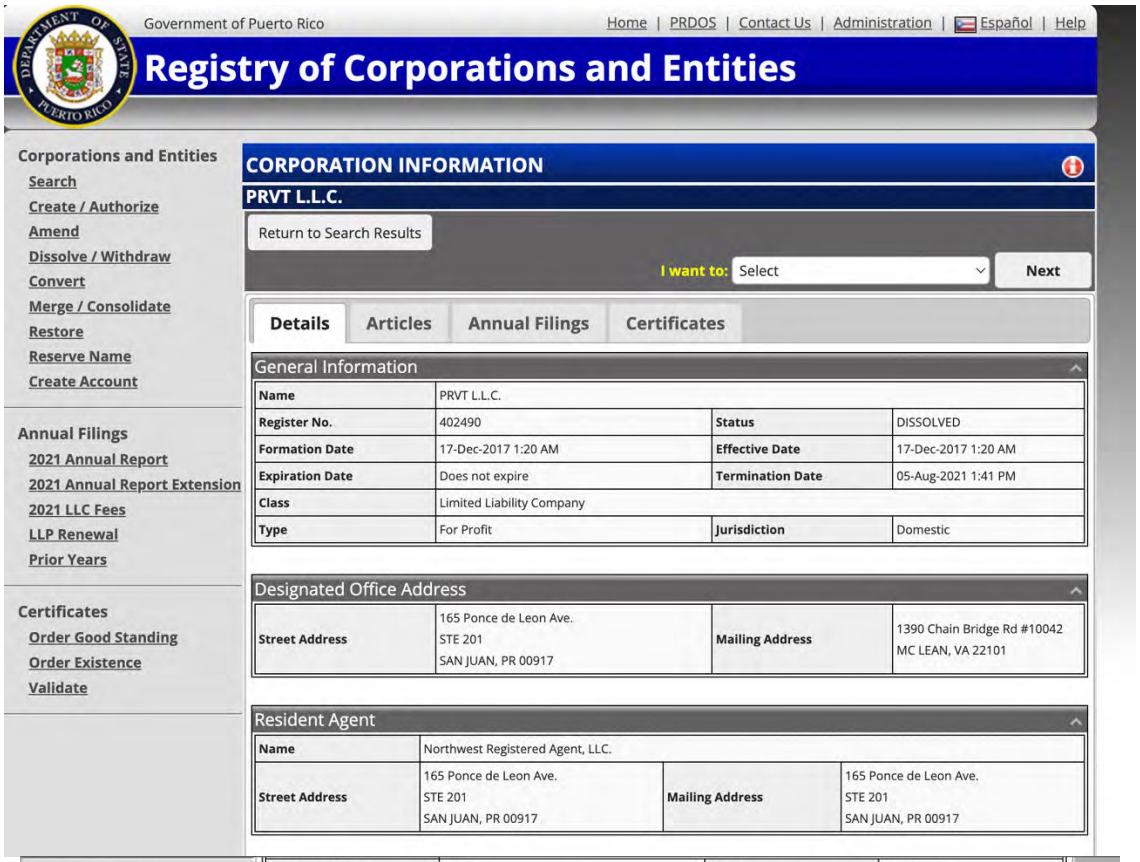
Authorized Persons

Name	Street Address	Mailing Address
Rivera Law Group, PLC	1390 Chain Bridge Road, #10042, MC LEAN, VA, 22101	1390 Chain Bridge Road, #10042, MC LEAN, VA, 22101

Purpose

For any lawful purpose authorized under the law.

Return to Search Results



Government of Puerto Rico

Home | PRDOS | Contact Us | Administration | Español | Help

Registry of Corporations and Entities

Corporations and Entities
- Search
- Create / Authorize
- Amend
- Dissolve / Withdraw
- Convert
- Merge / Consolidate
- Restore
- Reserve Name
- Create Account

Annual Filings
- 2021 Annual Report
- 2021 Annual Report Extension
- 2021 LLC Fees
- LLP Renewal
- Prior Years

Certificates
- Order Good Standing
- Order Existence
- Validate

CORPORATION INFORMATION

PRVT L.L.C.

Return to Search Results

I want to: Select Next

Details | Articles | Annual Filings | Certificates

General Information

Name	PRVT L.L.C.		
Register No.	402490	**Status**	DISSOLVED
Formation Date	17-Dec-2017 1:20 AM	**Effective Date**	17-Dec-2017 1:20 AM
Expiration Date	Does not expire	**Termination Date**	05-Aug-2021 1:41 PM
Class	Limited Liability Company		
Type	For Profit	**Jurisdiction**	Domestic

Designated Office Address

Street Address	165 Ponce de Leon Ave. STE 201 SAN JUAN, PR 00917	**Mailing Address**	1390 Chain Bridge Rd #10042 MC LEAN, VA 22101

Resident Agent

Name	Northwest Registered Agent, LLC.		
Street Address	165 Ponce de Leon Ave. STE 201 SAN JUAN, PR 00917	**Mailing Address**	165 Ponce de Leon Ave. STE 201 SAN JUAN, PR 00917

Annual Filings
- 2021 Annual Report
- 2021 Annual Report Extension
- 2021 LLC Fees
- LLP Renewal
- Prior Years

Certificates
- Order Good Standing
- Order Existence
- Validate

Register No.	402490	**Status**	DISSOLVED
Formation Date	17-Dec-2017 1:20 AM	**Effective Date**	17-Dec-2017 1:20 AM
Expiration Date	Does not expire	**Termination Date**	05-Aug-2021 1:41 PM
Class	Limited Liability Company		
Type	For Profit	**Jurisdiction**	Domestic

Designated Office Address

Street Address	165 Ponce de Leon Ave. STE 201 SAN JUAN, PR 00917	**Mailing Address**	1390 Chain Bridge Rd #10042 MC LEAN, VA 22101

Resident Agent

Name	Northwest Registered Agent, LLC.		
Street Address	165 Ponce de Leon Ave. STE 201 SAN JUAN, PR 00917	**Mailing Address**	165 Ponce de Leon Ave. STE 201 SAN JUAN, PR 00917

Administrators

Name / Title(s)	Street Address	Mailing Address
No records on file		

Authorized Persons

Name	Street Address	Mailing Address
Rivera Law Group, PLC	1390 Chain Bridge Road, #10042, MC LEAN, VA, 22101	1390 Chain Bridge Road, #10042, MC LEAN, VA, 22101

Purpose

For any lawful purpose authorized under the law.

Return to Search Results

Aaron Minc July 15, 2020 at 10:49 AM

RE:

To: Dr. Lucas Murrey

No problem, Lucas. Just wanted to make sure I gave you best advice/information possible when disclosing all this.

Domingo's e-mail that we use to contact him is djr@icyberlaw.com.

The third party neutral company that the site requests we work with, is called IRC (Internet Reputation Control, Inc.?). My understanding is that Domingo is (or at least used to be) a part owner email is: internet.reputation.control@gmail.com

As I mentioned on the phone, they are not the most responsive bunch. Domingo has really come through for us with for probably at least a dozen clients over the years acting as an intermediary to help us get IP information from the websites for posters. He's a very private individual. This line of work/association has gotten him targeted by nut cases often… including other shaming site website owners. I wouldn't believe what's online about him (although I don't keep tabs on what if anything is still out there).

Generally, if you want the site or Domingo to be helpful and work with you to remove content or assist in providing IP information for posts the LAST thing you want to do is threaten them legally. Especially since generally speaking claims, regardless of how well intentioned they are, basically never succeed in these situations.

If there is anything else we can assist with, please do not hesitate to reach out and let me know.

Regards,

Aaron Minc
Principal
Minc | Defamation Removal Law
Online Reputation &
Brand Protection Lawyers

Aminc@MincLaw.com
Main: (216) 373-7706
Cell: (330) 703-0214

knowledge of Minc Law working with Rivera to remove postings from CheaterReport.com.

Q. Mr. Minc, how about did your entity, Minc Law, LLC, effect the removal services for which I paid $7,000?

A. They contacted a company called Internet Representation Control, which CheaterReport.com publicly stated to reach out to, to contact, to get in touch with remove --

Q. Do --

A. -- excuse me. I'm not done --

Q. Please.

A. -- to remove posts from the website.

Q. Uh-huh. Do you have evidence of CheaterReport.com requesting the people use IRC as you suggested?

A. What kind of evidence would I have?

Q. Well, you said they stated on their website. Do you have a screenshot of Cheater Report stating that?

A. It's my recollection.

Q. So you're not sure?

A. My recollection.

Q. You're sure about your recollection, but you don't have evidence?

A. And we did have a blog article that I wrote

THE STATE OF OHIO,)

) SS: NOTARY CERTIFICATE

COUNTY OF MEDINA.)

I, Christine A. Schirripa, a Registered Professional Reporter, Certified Reporting Instructor, and Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within-named witness AARON MINC, ESQUIRE, was by me first duly sworn to testify the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given by him was by me reduced to Stenotype in the presence of said witness, afterwards prepared and produced by means of Computer-Aided Transcription and that the foregoing is a true and correct transcript of the testimony so given by him as aforesaid.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified, and was completed without adjournment.

I do further certify that I am not a relative, employee of or attorney for any party or counsel, or otherwise financially interested in this action.

I do further certify that I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Brunswick, Ohio, on this 4th day of October, 2021.

_____

Christine A. Schirripa, RPR, CRI, Notary Public
My Commission Expires 11-26-21

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

AARON M. MINC; MINC, LLC,	)	
	)	
Plaintiffs/Counterclaim Defendants,	)	
	)	
v.	)	Case No. CV-20-937433
	)	Judge Deborah M. Turner
DR. STEWART LUCAS MURREY,	)	
	)	
Defendant/Counterclaimant.	)	

- - -

THE ZOOM DEPOSITION OF AARON M. MINC, ESQUIRE
SEPTEMBER 8TH, 2021

- - -

Zoom deposition of AARON M. MINC, ESQUIRE, as if upon Cross-Examination before Christine A. Schirripa, a Registered Professional Reporter, Certified Reporting Instructor, and Notary Public in and for the State of Ohio, on Wednesday, the 8th day of September, 2021, via Zoom, commencing at 9:28 a.m.

- - -

APPEARANCES:

On Behalf of Plaintiff/Counterclaim Defendants:

AARON M. MINC, ESQUIRE

Minc Law, LLC

200 Park Avenue, Suite 200

Orange Village, Ohio 44122

On Behalf of Defendant/Counterclaimant:

STEWART LUCAS MURREY, Ph.D.

1217 Wilshire Boulevard #3655

Santa Monica, California 90403

INDEX

Witness	Page
Aaron Minc	
Cross-Examination by Dr. Murrey	4

(Exhibits 1-11 were premarked for identification.)

DR. MURREY: So let's go on the record. Mr. Minc, are you willing to be sworn in remotely?

MR. MINC: Yes, I am.

AARON N. MINC, ESQUIRE,

a Plaintiff/Counterclaim Defendant, called by the Defendant/Counterclaimant for the purpose of Cross-Examination, as provided by the Ohio Rules of Civil Procedure, being by me first duly sworn, as hereinafter certified, deposes and says as follows:

- - -

CROSS-EXAMINATION

BY DR. MURREY:

Q. Well, thanks for showing up. Good morning. It's a little earlier here in Los Angeles.

Mr. Minc, you're here representing yourself and Minc, LLC, or also known as Minc Law. It's the 8th of September, 2021; is this correct?

A. I'm just here for myself today.

Q. The deposition was supposed to be for you and your company, so --

A. Yeah. Except the notice -- I object to the notice because it was deficient as to the company. It didn't list any topics that you wanted to depose the organization on, so it's just me today.

EXHIBIT 4

Patient Medical Record

MURREY, STEWART L

50 yo M, DOB: Jun 4, 1974
Account Number: 70158
1217 Wilshire Blvd
Santa Monica, CA 90403

Patient Medical Record	**Page(s)**
Encounters	2 to 28
Total Pages	**28**

Note: There may be certain notes which are not made available as per your physician's discretion, please contact your physician's office to obtain those.

APLA Health Olympic

5901 W OLYMPIC BLVD SUITE 500, LOS ANGELES, CA 90036-4804

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 03/10/2025

MURREY, STEWART L

50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

03/10/2025 **BH TV: Lilia Santoyo, LCSW**
Check In: 03:11 PM PST Check Out: 03:49 PM PST

Reason for Appointment

1. 03/10/2025 OK FOR BH -JT -

Vital Signs

Assessments

1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes

- 90832 Tele Therapy 30 min. Modifiers: 95

Follow Up

2 Weeks

Care Plan Details

Problem BH Progress Note - Established Client

***Clinician**

***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**

***Session start time** 3:11 p.m.
***Session end time** 3:46 p.m.
***Duration** 35 min

***Special Service Needs**

***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**

***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment

***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**

***HIV Status** HIV Negative

***Current issues, topics, stressors**

***Current issues, topics, stressors** Client presented with euthymic mood, congruent affect, average grooming, coherent thought, normal speech, and a/o x4. Client reports continued decrease in anxiety, but still has concerns regrading the impact the situation has on future work and loved ones.

***Therapeutic interventions & response**

***Therapeutic interventions & response** Provided empathic listening, normalized/validated concerns, discussed past impact of situation with work and loved ones, and coping via CBT. Client reported that he is seeking new work possibility. He shared having some concern about working more and having limited ability to work on his case. However, he is excited about the opportunity. He is doing better with his anxiety although he still thinks of the past disruption the situation caused him with work and relationships. He indicated that he does his best to keep things private, but also understands that the use of technology is inevitable.

***Progress toward goals**

***Progress toward goals** Moderate progress. Client reports decrease in anxiety, but continued thoughts about the negative impact the defamation has had in his life.

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 03/10/2025

***Referrals & Plan**

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen in two weeks to report on continued symptom management.

***Treatment plan modification indicated?** No

***Next appointment:** Weekly appointment set

Electronically signed by Lilia Santoyo , LCSW on 03/13/2025 at 09:27 PM PDT

Sign off status: Completed

Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 03/10/2025

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 03/03/2025

MURREY, STEWART L

50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

03/03/2025 **BH TV: Lilia Santoyo, LCSW**
Check In: 03:08 PM PST Check Out: 04:34 PM PST

Reason for Appointment
1. 03/03/2025 OK FOR BH - JT

Vital Signs

Assessments
1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes
- 90832 Tele Therapy 30 min. Modifiers: 95

Follow Up
1 Week

Care Plan Details
Problem BH Progress Note - Established Client

***Clinician**

***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**

***Session start time** 3:06 p.m.
***Session end time** 3:38 p.m.
***Duration** 32 min

***Special Service Needs**

***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**

***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment

***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**

***HIV Status** HIV Negative

***Current issues, topics, stressors**

***Current issues, topics, stressors** Client presented with euthymic mood, congruent affect, average grooming, coherent thought, normal speech, and a/o x4. Client reports decrease in anxiety, but still struggles emotionally when he reflects on the impact the situation has had on others. He reported thinking about his previous girlfriend and her struggles with the situation while battling cancer. Client indicated that it is painful to remember those things.

***Therapeutic interventions & response**

***Therapeutic interventions & response** Provided empathic listening, discussed recent triggers, normalized/validated mood related to past, and coping via CBT. Client shared that he recently went to do some pleadings and filings in civil court and having to think and deal with the past events brought back some of its pain. He reported feeling sad and hurt by the impact the situation had on his previous partner who was attacked and harassed while dealing with cancer. In addition, he shared that he was falsely arrested 2 weeks after her death as the women had indicated that he was killing women with rat poison. He shared feeling horrible remembering those things. He indicated that people create lies and spread them on social media with no regret or feeling for others. He hopes that all he is doing legally will help

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 03/03/2025

someday hold those people accountable for the pain and suffering they cause. He shared that he will be okay as he continues to work on his case. He continues to be mindful of his time spent on social media, and self care to manage his anxiety and mood.

***Progress toward goals**

***Progress toward goals** Mild progress. Client reports some mood symptoms due to being triggered and thinking about his deceased girlfriend. Client reports continued self-care and monitoring of time spent on social media.

***Referrals & Plan**

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen next week to report on continued symptom management

***Treatment plan modification indicated?** No

***Next appointment:** Weekly appointment set

Electronically signed by Lilia Santoyo , LCSW on 03/04/2025 at 10:09 AM PST

Sign off status: Completed

Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 03/03/2025

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 02/24/2025

MURREY, STEWART L

50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

02/24/2025 **BH TV: Lilia Santoyo, LCSW**
Check In: 03:01 PM PST Check Out: 11:27 AM PST

Reason for Appointment
1. 02/24/2025 OK FOR BH -JT -

Vital Signs

Assessments
1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes
- 90834 Tele Therapy 45 min. Modifiers: 95

Follow Up
1 Week

Care Plan Details
Problem BH Progress Note - Established Client

***Clinician**
***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**
***Session start time** 3:02 p.m.
***Session end time** 3:46 p.m.
***Duration** 44 min

***Special Service Needs**
***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**
***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment
***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**
***HIV Status** HIV Negative

***Current issues, topics, stressors**
***Current issues, topics, stressors** Client presented with euthymic mood, congruent affect, average grooming, coherent thought, normal speech, and a/o x4. Client reports feeling okay, but states that he still struggles with his sleep due to odd dreams and the economic damage. He shared that he has been thinking a lot about the loss in opportunities and the stress that it has caused in his relationships.

***Therapeutic interventions & response**
***Therapeutic interventions & response** Provided empathic listening, discussed mood, anger, continued thought management, and coping via CBT. Client reports that he has been thinking about the loss opportunities due to being defamed by some random people. In addition, he indicated that it has been hard on all his relationships, but especially love relationships due to the nature of the website. He reports that he is still managing his time on social platforms, and is doing better with the anxiety. He shared that he has been thinking about the financial impact as things are so expensive and opportunities have been limited. He reports still feeling grateful for the support from his parents and girlfriend. He shared that spending time with them helps his mood and give him hope that things will be resolved.

***Progress toward goals**
***Progress toward goals** Mild progress. Client reports slight decrease in anxiety, and ability to sleep in spite of odd dreams.

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 02/24/2025

***Referrals & Plan**

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen next week to report on continued symptom management

***Treatment plan modification indicated?** No

***Next appointment:** Weekly appointment set

Electronically signed by Lilia Santoyo , LCSW on 02/28/2025 at 04:30 AM PST

Sign off status: Completed

Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 02/24/2025

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 02/10/2025

MURREY, STEWART L

50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

02/10/2025 **BH TV: Lilia Santoyo, LCSW**
Check In: 02:59 PM PST Check Out: 03:55 PM PST

Reason for Appointment

1. 02/10/2025 OK FOR BH -JT -

Vital Signs

Assessments

1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes

- 90834 Tele Therapy 45 min. Modifiers: 95

Follow Up

1 Week

Care Plan Details

Problem BH Progress Note - Established Client

***Clinician**

***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**

***Session start time** 2:59 p.m.
***Session end time** 3:47 p.m.
***Duration** 48 min

***Special Service Needs**

***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**

***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment

***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**

***HIV Status** HIV Negative

***Current issues, topics, stressors**

***Current issues, topics, stressors** Client presented with pleasant mood, congruent affect, average grooming, coherent thought, normal speech, and a/o x4. Client reported some struggle with sleep but feeling less anxious as he is feeling better about his court case. He added that work is slowly coming back.

***Therapeutic interventions & response**

***Therapeutic interventions & response** Provided empathic listening, addressed anxiety, work, and current relationships via CBT. Client indicated feeling slightly better even though his sleep is still disrupted with weird dreams. He shared feeling okay as he has a good partner and his relationship with his parents is good. He added looking forward to job opportunities and moving forward with his life. He shared that his legal case is moving on and he hopes to create a remedy when it comes to large tech companies, as there needs to be accountability for the platforms they create.

***Progress toward goals**

***Progress toward goals** Moderate progress. Client reports decrease in symptoms and improved ability to manage symptoms.

***Referrals & Plan**

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 02/10/2025

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen next week to report on continued symptoms management
***Treatment plan modification indicated?** No
***Next appointment:** Weekly appointment set

Electronically signed by Lilia Santoyo , LCSW on 04/08/2025 at 11:22 AM PDT
Sign off status: Completed
Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 02/10/2025

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)
Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 02/03/2025

MURREY, STEWART L

50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

02/03/2025 **BH TV: Lilia Santoyo, LCSW**
Check In: 03:04 PM PST Check Out: 04:20 PM PST

Reason for Appointment
1. 02/03/2025 OK FOR BH -JT -

Vital Signs

Assessments
1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes
- 90834 Tele Therapy 45 min. Modifiers: 95

Follow Up
1 Week

Care Plan Details
Problem BH Progress Note - Established Client

***Clinician**
***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**
***Session start time** 3:04 p.m.
***Session end time** 3:45 p.m.
***Duration** 41 min

***Special Service Needs**
***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**
***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment
***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**
***HIV Status** HIV Negative

***Current issues, topics, stressors**
***Current issues, topics, stressors** Client presented with pleasant mood, congruent affect, average grooming, coherent thought, normal speech, and a/o x4. Client reported doing well today, as his legal cases are moving forward. he reports ability to sleep and ability to manage anxiety.

***Therapeutic interventions & response**
***Therapeutic interventions & response** Provided empathic listening, addressed symptom management, and self-care via CBT. Client shared that he has been doing okay. He shared being able to sleep which helps him manage his anxiety and thoughts during the day regarding his legal cases, and completing tasks. He reports concern over current actions by the new administration and indicated that he is also managing his thoughts to not increase fear.

***Progress toward goals**
***Progress toward goals** Mild progress. Client reports decrease in symptoms and improved ability to manage thoughts and sleep.

***Referrals & Plan**

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 02/03/2025

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen next week to report on continued symptoms management
***Treatment plan modification indicated?** No
***Next appointment:** Weekly appointment set

Electronically signed by Lilia Santoyo , LCSW on 02/07/2025 at 09:18 AM PST
Sign off status: Completed
Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 02/03/2025

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)
Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 01/13/2025

MURREY, STEWART L
50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

01/13/2025
Check In: 03:02 PM PST Check Out: 05:19 PM PST

BH TV: Lilia Santoyo, LCSW

Reason for Appointment
1. 01/13/2025 OK FOR BH -JT -

Vital Signs

Assessments
1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes
- 90834 Tele Therapy 45 min. Modifiers: 95

Follow Up
1 Week

Care Plan Details
Problem BH Progress Note - Established Client

***Clinician**
***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**
***Session start time** 3:03 p.m.
***Session end time** 3:43 p.m.
***Duration** 40 min

***Special Service Needs**
***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**
***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment
***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**
***HIV Status** HIV Negative

***Current issues, topics, stressors**
***Current issues, topics, stressors** Client presented with pleasant mood, congruent affect, average grooming, coherent thought, normal speech, and a/o x4. Client shared having some anxiety due to his father's health, but shared slight decrease in symptoms and improved ability to sleep.

***Therapeutic interventions & response**
***Therapeutic interventions & response** Provided empathic listening, discussed recent anxiety, normalized anxiety, and continued decrease in symptoms via CBT. Client reported that he has noticed a difference as he has tried to limit his screen time. He reports still waking up at night, but it is les frequent and he is able to go back to sleep. He shared that his anxiety has shifted a bit due to his parents' health concerns. Client agreed to continue to monitor his screen time and sleep.

***Progress toward goals**
***Progress toward goals** Mild progress. Client reports decrease in sleep disturbances, but is unsure of actual progress on issue as anxiety has shifted due to concerns with his father's health.

***Referrals & Plan**

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 01/13/2025

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen in two weeks to report on his sleep, paranoia, and anxiety.
***Treatment plan modification indicated?** No
***Next appointment:** Weekly appointment set

Electronically signed by Lilia Santoyo , LCSW on 01/14/2025 at 11:32 AM PST
Sign off status: Completed
Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 01/13/2025

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)
Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 12/23/2024

MURREY, STEWART L

50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

12/23/2024
Check In: 03:12 PM PST Check Out: 03:49 PM PST

BH TV: Lilia Santoyo, LCSW

Reason for Appointment
1. 12/23/2024 OK FOR BH -JT -

Vital Signs

Assessments
1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes
- 90832 Tele Therapy 30 min. Modifiers: 95

Follow Up
2 Weeks

Care Plan Details
Problem BH Progress Note - Established Client

***Clinician**
***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**
***Session start time** 3:12 p.m.
***Session end time** 3:47 p.m.
***Duration** 35 min

***Special Service Needs**
***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**
***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment
***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**
***HIV Status** HIV Negative

***Current issues, topics, stressors**
***Current issues, topics, stressors** Client presented with pleasant mood, congruent affect, average grooming, coherent thought, normal speech, and a/o x4. Client reported decrease in nightmares, but reported waking up throughout the night and nothing times and drawing the moon. Client reports decrease in symptoms but recent event outside the courthouse that set off some non-bizarre paranoia.

***Therapeutic interventions & response**
***Therapeutic interventions & response** Provided empathic listening, explored recent event, continued self-care, and coping via CBT. Client shared that he is doing okay, but reported being filmed after leaving court last Tuesday. He shared that he recorded them back. He shared that the incident triggered some paranoia around his legal case. Client states having some protection against being filmed but shares that he just cannot simply relax. He indicated that he is mindful of his time on the computer and has been able to manage most of the anxiety. He added that he will be participating in some holiday outings and will be away with his parents for New Year's

***Progress toward goals**
***Progress toward goals** Minimal progress. Client reports decrease in sleep nightmares, but still has disturbed sleep. He is mindful of his time online, and has been able to manage most of the paranoia surrounding his legal case.

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 12/23/2024

***Referrals & Plan**

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen in two weeks to report on his sleep, paranoia, and anxiety.

***Treatment plan modification indicated?** No

***Next appointment:** Weekly appointment set

Electronically signed by Lilia Santoyo , LCSW on 12/23/2024 at 04:14 PM PST

Sign off status: Completed

Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 12/23/2024

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 12/16/2024

MURREY, STEWART L

50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

12/16/2024
Check In: 03:13 PM PST Check Out: 03:53 PM PST

BH TV: Lilia Santoyo, LCSW

Reason for Appointment

1. 12/16/2024 OK FOR BH -JT -

Vital Signs

Assessments

1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes

- 90834 Tele Therapy 45 min. Modifiers: 95

Follow Up

1 Week

Care Plan Details

Problem BH Progress Note - Established Client

***Clinician**

***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**

***Session start time** 3:13 p.m.
***Session end time** 3:53 p.m.
***Duration** 40 min

***Special Service Needs**

***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**

***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment

***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**

***HIV Status** HIV Negative

***Current issues, topics, stressors**

***Current issues, topics, stressors** Client presented with pleasant mood, congruent affect, average grooming, coherent thought, normal speech, and a/o x4. client reports continued struggle with nightmares, and some paranoia when outdoors. Client added that he is still spending time on social media.

***Therapeutic interventions & response**

***Therapeutic interventions & response** Provided empathic listening, addressed continued nightmares, anxiety/fear, inability to limit time online, and impact on interpersonal relationships via CBT. Client shared that he is still bothered by the nightmares and agreed to write them down to further address/process. In addition, he indicated that he is still spending about six hours online. He shared that some of it is his own work, but he still goes on to the negative platforms. Client stated that he will seek to limit himself and spend time on alternate media. He agreed that the smear campaign against him has taken a toll on his personal relationships with family and love life. He stated having limited support on the issue from his family.

***Progress toward goals**

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 12/16/2024

***Progress toward goals** Minimal progress. Client reports continued ability to sleep but is also experiencing nightmares. He has also not been able to limit his online time which has severely impacted his interpersonal relationships.

***Referrals & Plan**

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen next week to report on progress with sleep and time limits online.

***Treatment plan modification indicated?** No

***Next appointment:** Weekly appointment set

Electronically signed by Lilia Santoyo , LCSW on 12/16/2024 at 10:17 PM PST

Sign off status: Completed

Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 12/16/2024

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 12/09/2024

MURREY, STEWART L

50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

12/09/2024
Check Out: 12:58 PM PST

BH TV: Lilia Santoyo, LCSW

Vital Signs

Assessments

1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes

- 90834 Tele Therapy 45 min. Modifiers: 95

Follow Up

1 Week

Care Plan Details

Problem BH Progress Note - Established Client

***Clinician**

***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**

***Session start time** 12:09 p.m.
***Session end time** 12:55 p.m.
***Duration** 46 min

***Special Service Needs**

***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**

***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment

***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**

***HIV Status** HIV Negative

***Current issues, topics, stressors**

***Current issues, topics, stressors** Client presented with pleasant mood, congruent affect, average grooming, coherent thought, normal speech, and a/o x4. Client reported doing okay. He indicated that his sleep is good , yet he has been having vivid nightmares.

***Therapeutic interventions & response**

***Therapeutic interventions & response** Provided empathic listening, discussed the most recent nightmare, anxiety/fear, and coping strategies via CBT. Client indicated that the tend to be filled with doom and dread. He shared that in one of the nightmares his computer devices were taken away and he could not meet his goal without it. He also dreamed that his computer shrunk. He indicated that he spends most of his time doing research on his computer which also he tends to navigate into the negative platforms and see the stuff that random strangers write about him. Client shared that he likes gardening as it helps his mood, but also agreed to set limits on his time spent on the computer to help decrease his anxiety.

***Progress toward goals**

***Progress toward goals** Mild progress. Client reports some improvement with sleep, yet he is having vivid dreams that are anxiety provoking. He is struggling to manage his time spent reading negative comments.

***Referrals & Plan**

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen next week to report on progress with sleep and time limits with his computer.

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 12/09/2024

***Treatment plan modification indicated?** No
***Next appointment:** Weekly appointment set

Electronically signed by Lilia Santoyo , LCSW on 12/12/2024 at 10:02 AM PST
Sign off status: Completed
Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 12/09/2024

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)
Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 12/02/2024

MURREY, STEWART L

50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

12/02/2024 **BH TV: Lilia Santoyo, LCSW**
Check In: 02:57 PM PST Check Out: 03:55 PM PST

Reason for Appointment

1. 12/02/2024 OK FOR BH - JT

Vital Signs

Assessments

1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes

- 90834 Tele Therapy 45 min. Modifiers: 95

Follow Up

1 Week

Care Plan Details

Problem BH Progress Note - Established Client

***Clinician**

***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**

***Session start time** 3:05 p.m.
***Session end time** 3: 53 p.m.
***Duration** 48 min

***Special Service Needs**

***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**

***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment

***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**

***HIV Status** HIV Negative

***Current issues, topics, stressors**

***Current issues, topics, stressors** Client presented with pleasant mood, congruent affect, average grooming, coherent thought, normal speech, and a/o x4. Client reports slightly improved sleep as he has unplugged the internet from his room at night. He reports still having some fallout with family over the situation with the website and allegations.

***Therapeutic interventions & response**

***Therapeutic interventions & response** Provided empathic listening, validated concerns over family's opinions of the situation, managing anxiety, and decrease paranoia when being outdoors via CBT. Client reported feeling slightly better as sleep helps him manage the negative thinking. He added that he does go out but is still very cautious. He shared that he has gone on the chats and reports getting negative judging comments that do bother him, but he is able to not engage further.

***Progress toward goals**

***Progress toward goals** Mild progress. Client reports ability to sleep and manage some of the anxiety related to legal issue. He is still looking into the comments which continue to take of his mental peace,

***Referrals & Plan**

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 12/02/2024

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen next week to report on progress with sleep and avoiding social media comments.
***Treatment plan modification indicated?** No
***Next appointment:** Weekly appointment set

Electronically signed by Lilia Santoyo , LCSW on 12/03/2024 at 10:59 AM PST
Sign off status: Completed
Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 12/02/2024

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)
Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 11/18/2024

MURREY, STEWART L

50 Y old Male, DOB: 06/04/1974
Account Number: 70158
1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Home: 424-278-3017
Guarantor: MURREY, STEWART L Insurance: Carelon CC Commercial
Referring: Sean Boileau
Appointment Facility: APLA Health & Wellness - David Geffen Center

11/18/2024
Check Out: 03:49 PM PST

BH TV: Lilia Santoyo, LCSW

Reason for Appointment

1. 11/18/2024 OK FOR BH -JT -

Vital Signs

Assessments

1. Generalized anxiety disorder - F41.1 (Primary)

Visit Codes

- 90834 Tele Therapy 45 min. Modifiers: 95

Follow Up

2 Weeks

Care Plan Details

Problem BH Progress Note - Established Client

***Clinician**

***Services provided by:** Lilia Santoyo, LCSW
Location services provided: Other
Describe other: Telehealth

***Session time**

***Session start time** 3:08 p.m.
***Session end time** 3:47 p.m.
***Duration** 39 min

***Special Service Needs**

***Client seen alone?** Yes

***Stressors / Significant Changes in Client's Condition**

***Significant change from last visit** No
***Client present as a risk to self or others?** No

Risk & Safety Assessment

***Current risk or safety concerns** None Noted

***Relevant Medical Conditions**

***HIV Status** HIV Negative

***Current issues, topics, stressors**

***Current issues, topics, stressors** Client presented with pleasant mood, congruent affect, average grooming, coherent thoughts, and a/o x4. Client reports trouble with sleep due to smear campaign via Facebook. He reports trouble with panic attacks and anxiety since then. At this time he reports meditation and healthy diet have helped manage most of the anxiety, but currently struggles inability to sleep.

***Therapeutic interventions & response**

***Therapeutic interventions & response** Provided empathic listening, explored other coping strategies, nighttime routine, and decrease in time spent online via CBT. Client shared that he tries to limit his time online, but it is difficult as his life has been turned upside down by others who write things about him anonymously. In addition, he shared that he does research online which at times leads to him going on to the other sites. Client agreed to try and avoid screen time at night and to have his phone away from his nightstand to avoid scrolling when he wakes up in the middle of the night.

***Progress toward goals**

***Progress toward goals** Minimal progress. Client was seen by current therapist for the first time. Client reports some coping strategies but struggles with sleep.

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 11/18/2024

***Referrals & Plan**

Plan (objectives for next session, homework, consultation/care coordination needs, follow up) Client will be seen in two weeks to reports on symptom management and limiting screen time at night.

***Treatment plan modification indicated?** No

***Next appointment:** Weekly appointment set

Care Pathway

***Problems/Diagnoses Identified:** Anxiety

Electronically signed by Lilia Santoyo , LCSW on 01/01/2025 at 10:45 PM PST

Sign off status: Completed

Visit Status: CHK (Check Out)

APLA Health & Wellness - David Geffen Center
611 S KINGSLEY DR
LOS ANGELES, CA 90005-2319
Tel: 213-201-1600
Fax: 888-736-9436

Progress Note: Lilia Santoyo, LCSW 11/18/2024

Note generated by eClinicalWorks EMR/PM Software (www.eClinicalWorks.com)

Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 10/30/2024

BH Initial TV

Patient: MURREY, STEWART L
Account Number: 70158
DOB: 06/04/1974 **Age:** 50 Y **Sex:** Male
Phone: 424-278-3017
Address: 1217 Wilshire Blvd, APT 3655, Santa Monica, CA-90403
Check In: 03:11 PM PST **Check Out:** 04:00 PM PST

Provider: Lisa Bendimez, PsD
Date: 10/30/2024

Subjective:

Chief Complaints:

1. 10/30/24 OK FOR BH -JT -.

HPI:

Depression Screening:

GAD-7 (2018 Edition)

Feeling nervous, anxious, or on edge *Nearly every day*
Not being able to stop or control worrying *Nearly every day*
Worrying too much about different things *Nearly every day*
Trouble relaxing *Nearly every day*
Being so restless that it is hard to sit still *Nearly every day*
Becoming easily annoyed or irritable *Nearly every day*
Feeling afraid as if something awful might happen *Nearly every day*
Total GAD-7 Score *21*
If you checked any problems, how difficult have they made it for you to do your work, take care of things at home, or get along with other people? *Extremely difficult*
Interpretation of Total *(15 and over) Severe*

Depression Screening:

PHQ-9

Little interest or pleasure in doing things *Nearly every day*
Feeling down depressed or hopeless *Nearly every day*
Trouble falling or staying asleep or sleeping too much *Nearly every day*
Feeling tired or having little energy *Nearly every day*
Poor appetite or overeating *Nearly every day*
Feeling bad about yourself or that you are a failure or have let yourself or your family down *Nearly every day*
Trouble concentrating on things such as reading the newspaper or watching television *Nearly every day*
Moving or speaking so slowly that other people could have noticed or the opposite being so fidgety or restless that you have been moving around a lot more than usual *Nearly every day*
Thoughts that you would be better off dead or of hurting yourself in some way *Not at all*
Total Score *24*
Interpretation *Severe Depression*

Medical History:

Social History:

Drug/Alcohol:

DAST-10 (2021 Edition)

1. Have you used drugs other than those required for medical reasons? *No*
2. Do you abuse more than one drug at a time? *No*
3. Are you always able to stop using drugs when you want to? *Yes*
4. Have you had blackouts or flashbacks as a result of drug use? *No*
5. Do you ever feel bad or guilty about your drug use? *No*
6. Does your spouse (or parents) ever complain about your involvement with drugs? *No*
7. Have you neglected your family because of your use of drugs? *No*
8. Have you engaged in illegal activities in order to obtain drugs? *No*
9. Have you ever experienced withdrawal symptoms (felt sick) when you stopped taking drugs? *No*
10. Have you had medical problems as a result of your drug use (e.g., memory loss, hepatitis, convulsions, bleeding etc.)? *No*

Results: *0*
Interpretation of Score: *No problems reported*

Drugs/Alcohol:

AUDIT

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 10/30/2024

Total Score: *3*
Interpretation: *Alcohol Education*

Objective:

Vitals:

Assessment:

Assessment:
1. Generalized anxiety disorder - F41.1 (Primary)

Plan:

Treatment:
Follow Up: 1 Week (Reason: Indiv Therapy)

Billing Information:

Visit Code:
90837 Tele Therapy 60 min. Modifiers: 95
Procedure Codes:

Care Plan Details

Anxiety disorder

Goal	Objective	Intervention
G1.ANX: Reduce frequency, intensity, and duration of anxiety to improve daily functioning Goal Outcome:In Progress Start Date:10/30/2024	O1.Develop cognitive or behavioral strategies to reduce symptoms and eliminate impairment	I1.Provide individual psychotherapy weekly for three months/12 sessions and reassess
		I2.Assist client with needed referrals, encourage engagement, and monitor for follow through
		I3.Administer GAD-7 to assess anxiety. Readminister quarterly to monitor progress.
		I4.Assess and continuously monitor the severity of the level of impairment to the client's important areas of functioning to determine level of care, duration and scope of treatment, and whether client continues to meet criteria for medical necessity.
		I5.Assess and continuously monitor the efficacy of treatment and the client's engagement in care to determine prognosis and the likelihood of treatment success.
		I6.Coordinate care with client's physicians and other care providers to facilitate the delivery

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 10/30/2024

		of safe, appropriate, and effective health care services.
		I7. Consistent with treatment model, discuss how cognitive, behavioral, interpersonal, intrapsychic, family history, or other factors contribute to presenting issues and impairment in functioning.
G2. ANX: Learn and implement coping skills that result in a reduction of anxiety and worry, and improve daily functioning Goal Outcome:In Progress Start Date:10/30/2024	O1. Learn to use relaxation, distraction, self-soothing, breathing, and/or guided imagery to reduce symptoms	I1. Assign behavioral interventions designed to counteract impaired functioning (e.g. behavioral activation, assertiveness skills, social interaction, spiritual practices, exercise plan, etc.). Review outcomes in session.
		I2. Use mindfulness meditation and techniques to manage symptoms, decrease experiential avoidance, and reduce negative thought processes.

***Clinician**

***Services provided by:** Chis Tompkins, AMFT

***Session time**

***Session start time** 3:10pm

***Session end time** 4:00pm

***Duration** 50 min

***Special Service Needs**

***Client seen alone?** Yes

***Presenting Problem/Chief Complaint**

***Current symptoms/behaviors (include onset, intensity, duration):** Ct consented to Telehealth session. Ct was informed at intake that Th is an Associate Marriage and Family Therapist being supervised by a licensed psychologist. Ct consented to therapy with an AMFT. Ct logged on on time and presented with an anxious mood, congruent affect, good grooming, appropriate eye contact, coherent thought process, speech WNL, OX4. Pronouns: he/him Ct reports in 2023 he started noticing people seemed to "talk about him or look at him in public." Ct reports in 2023 he discovered anonymous Facebook accounts about women who falsely said they dated him and started Facebook groups about him. Ct reports the group is called "Are we dating the same guy" with over 300 Facebook accounts involved. Ct reports that he experienced "cyberbullying" and so he contacted the FBI and the LAPD to file a report. Ct reports he was "forced to file a lawsuit" to bring "these people to justice." Ct reports about 4 months ago people found out where he lives and now he's forced to move. Ct reports this "severely traumatic event" has impacted his health and that he's had to go to the doctors multiple time over the past few months. Ct reports this has caused him to lose jobs and his social support. Ct reports he's had to become more private. Ct reports he was also banned from "dating sites" because the people who were cyberbullying him falsely accused him of causing harm. Ct reports they even said he murdered his ex-girlfriend who Ct reports died from cancer in 2018. Ct reports he currently has an active court case that has been going on since June 2023 where he is the plaintiff and there are at least 4 defendants.

***Mental Health History**

***Client reports mental health history** Denies/unknown

***Currently taking psychotropic medication?** No

***Alcohol / Substance Use**

***Current alcohol / substance use** No

***Past alcohol / substance use** No

Cultural Considerations

Cultural/religious/spiritual belief systems Ct reports he's very spiritual and "writes a lot about different religions." Ct reports that he considers himself spiritual and religious.

Risk & Safety Assessment

MURREY, STEWART L **DOB:** 06/04/1974 (50 yo M) **Acc No.** 70158 **DOS:** 10/30/2024

***Current risk or safety concerns** Recent trauma exposure;Recent job loss
Describe any risk/safety concerns marked "yes" including safety measures needed or taken Ct reports that he's experienced "extreme cyberbullying" that has been traumatic and caused him to lose jobs because his inability to focus on anything. Ct reports "the event" consumes his entire life and has extreme anxiety.

***Relevant Medical Conditions**
- ***Medical provider** LA Care
- ***HIV Status** HIV Negative
- ***Non-HIV medical conditions:** None reported

***General Description**
- ***Grooming & Hygiene** Average
- ***Eye Contact** Normal for culture
- ***Motor Activity** Calm
- ***Speech** Normal Rate/Flow
- ***Interactional Style** Cooperative
- ***Orientation** Oriented to Time;Oriented to Place;Oriented to Person;Oriented to Situation
- ***Memory** Short term Intact;Long term Intact

***Mood & Affect**
- ***Mood** Within Normal Limits
- ***Affect** Appropriate/Congruent
- ***Engagement** Within Normal Limits

***Perceptual Disturbances**
- ***Hallucinations** None Apparent
- ***Self-Perceptions** Within Normal Limits

***Thought Process Disturbances**
- ***Judgment** Mild Impairment
- ***Insight** Adequate Insight

***Thought Content Disturbances**
- ***Delusions** Paranoid
- ***Ideations** Suspicious
- ***Behavioral Disturbances** None
- ***Suicidal** Denies
- ***Homicidal** Denies
- ***Organization** Normal/Organized

MURREY, STEWART L DOB: Jun 4, 1974 (50 yo M) Acc No. 70158

Electronically signed by Chris Tompkins on 10/30/2024 at 06:24 PM PDT

This patient has been seen under the direct supervision of Lisa Bendimez, Psy.D., who is in agreement with the treatment plan
Sign off status: Completed
Visit Status: CHK (Check Out)

Provider: Lisa Bendimez, PsD

Date: 10/30/2024
Generated for Printing/Faxing/eTransmitting on: 04/08/2025 02:17 PM PDT

EXHIBIT 5

DECLARATION OF ALEXANDER J. PETALE

I, ALEXANDER J. PETALE, declare:

1. I am an attorney admitted to practice within the state of California and I am not a party to this action. I have personal knowledge of the matter set forth herein and would competently testify thereto if called and sworn as a witness.

2. I met Dr. Stewart Lucas Murrey in late 2018 after which we became friends and then became his attorney and represented Dr. Murrey in a global settlement in 2019.

3. Given his educational background and interest in the law, I offered him part-time employment as a paralegal from approximately 2021 through 2024.

4. Although Dr. Murrey proved himself to be capable with research and writing, he was eventually overwhelmed with the online harassment and defamation he suffered as well as his personal lawsuits.

5. Unable to focus on the work for my law office, I unfortunately had to terminate his employment.

6. Alongside this financial harm, I am aware of a professional psychological evaluation of Dr. Murrey wherein Dr. Murrey is diagnosed as suffering from a generalized anxiety disorder and non-bizarre paranoia. I have personally witnessed what I believe to be symptoms of both these conditions.

I declare that under penalty of perjury under the laws of the United States and State of California that the foregoing is true and correct. Executed on 30/Apr/25 in Los Angeles, California.

ALEXANDER J. PETALE

EXHIBIT 6

Civil Case Access

Language Access
English

Case Information | | FUTURE HEARINGS | PARTY INFORMATION | Documents Filed | Past Proceedings

CASE INFORMATION: 18STLC05174

Case Title: DR. STEWART LUCAS MURREY VS SHERYL MARTINEZ

Filing Courthouse: Spring Street Courthouse

Filing Date: 4/3/2018

Case Type: Defamation (slander/libel) (General Jurisdiction)

Status: Request for Dismissal - Before Trial not following ADR or more than 60 days since ADR on 11/19/2018

Click here to access document images for this case.

If this link fails, you may go to the Case Document Images site and search using the case number displayed on this page

New Search

FUTURE HEARINGS

Case Information | | FUTURE HEARINGS | PARTY INFORMATION | Documents Filed | Past Proceedings

PARTY INFORMATION

Case Information | | FUTURE HEARINGS | PARTY INFORMATION | Documents Filed | Past Proceedings

CLARKE STEPHEN	Defendant
MARTINEZ SHERYL	Defendant
MURREY DR. STEWART LUCAS	Plaintiff

DOCUMENTS FILED

Case Information | | FUTURE HEARINGS | PARTY INFORMATION | Documents Filed | Past Proceedings

5/16/2019	Minute Order	Filed by Clerk
3/29/2019	Notice of Related Case	Filed by Dr. Stewart Lucas Murrey (Plaintiff)
11/19/2018	Request for Dismissal	Filed by Dr. Stewart Lucas Murrey (Plaintiff)
10/2/2018	Summons	Filed by Clerk

EXHIBIT 8

SETTLEMENT AGREEMENT AND RELEASE

This SETTLEMENT AGREEMENT and RELEASE ("AGREEMENT") is made and entered into by and between plaintiff Dr. Stewart Lucas Murrey; and defendant CITY OF LOS ANGELES, *only*.

WHEREAS, **DR. STEWART LUCAS MURREY**; filed suit against **CITY OF LOS ANGELES**, et al., in the United States District Court - Central District of California, bearing Case No. **2:18-cv-06880-FMO-AFM** and captioned **DR. STEWART LUCAS MURREY v. CITY OF LOS ANGELES, *et al.***, and includes the underlying tort claim, the underlying action, all appeals therefrom and all attorney's fees and costs (collectively referred to herein as the "Lawsuit").

WHEREAS, defendants **CITY OF LOS ANGELES, LOS ANGELES POLICE DEPARTMENT, DESHON ANDREWS, CODY HALCHISHAK, BRITTANY ROYER, ROBYN SALAZAR, SCOTTY STEVENS, AND KERRY YOUNG** will be dismissed with prejudice from this action. This settlement is between plaintiffs **DR. STEWART LUCAS MURREY,** and defendant **CITY OF LOS ANGELES** *only*.

WHEREAS, the parties wish to settle their differences and resolve any and all disputes and obligations between them, including the Lawsuit;

WHEREAS, this settlement is subject to the approval process of the Los Angeles City Council.

WHEREAS, in consideration of the covenants and mutual promises contained in this AGREEMENT, the parties agree as follows:

1. Agreement. In consideration of the amounts to be paid pursuant to this AGREEMENT and other valuable consideration, receipt of which is acknowledged, Plaintiff and his dependents, heirs, representatives, attorneys, agents, successors and assigns, and all such persons or entities that acted on their behalf with relation to the subject claims or otherwise (collectively "Plaintiffs"), forever release and discharge the CITY OF LOS ANGELES and its boards, bureaus, departments, divisions, officers, representatives, employees, attorneys, agents, assigns of all such persons or entities, and all persons that acted on its behalf with relation to the subject claims or otherwise, (hereinafter singly and collectively referred to as "Releasees"), from any and all claims, causes of action, damages, liabilities, expenses, fees, costs, and attorney's fees, which they ever had, now have, or which may later appear or accrue, for any losses, injuries or damages, whether anticipated or unanticipated, resulting from, arising out of or connected directly or indirectly with the Lawsuit, or violation of any state or federal statutory or administrative rules, regulations or codes, breach of any fiduciary duty, fraud of any nature including for punitive, treble and/or consequential damages, and for interest, costs and attorney's fees, and all allegations, express and implied, that were or could have been asserted, directly or indirectly, in the Lawsuit and by the Complaint in the Lawsuit, or relating to Plaintiffs' claims. The CITY OF LOS ANGELES and its Releasees similarly release Plaintiffs. The parties mutually assume the risk of this release and hereby release each other from any and all claims whether anticipated or not anticipated, known or unknown relating to the Lawsuit and Plaintiffs' claims thereunder.

2. Consideration. In consideration of the promises and releases contained in this Agreement, Plaintiffs agree to dismiss the Lawsuit with prejudice, and in exchange the CITY OF LOS ANGELES agrees to waive any costs it might otherwise seek from Plaintiffs and to pay the following sum: $[redacted] to Dr. Stewart Lucas Murrey. The payment shall be made in the ordinary course of business after this settlement has been approved by the Los Angeles City Council.

3. Costs and Attorney's Fees. The parties agree that the consideration set forth in paragraph 2 of this Agreement includes all costs and attorney's fees that could have been sought by Plaintiffs in connection with this Lawsuit and this Agreement.

4. Dismissal. Plaintiffs further agree and instruct their counsel to take whatever steps are necessary to dismiss the Lawsuit with prejudice.

5. Release Includes Unknown Claims. Plaintiffs hereby waive for all purposes the provisions of §1542 of the California Civil Code which provides as follows:

> "A general release does not extend to claims which the creditor does not know or suspect to exist in his favor at the time of executing the release, which if known by him must have materially affected his settlement with the debtor."

This waiver relates to all matters arising out of or in any way connected with this Agreement, Plaintiffs' claims, and as set forth in the Lawsuit.

6. Not an Admission. The parties to this Agreement recognize that any payments or agreements made pursuant to this Agreement are not an admission by Releasees of any liability whatsoever or responsibility for, or of the correctness of, any

claims made by Plaintiffs which liability, responsibility and correctness are expressly denied by Releasees.

7. Breach. Should any party breach any one or more of the terms and conditions of this Agreement, the non-breaching parties shall be entitled, at their option, singly or jointly, to take such action as deemed necessary, including but not limited to injunctive proceedings against the breaching party, and shall further be entitled to recover damages, and attorney's fees, if a non-breaching party prevails.

8. Authority and Ownership of Claims. Plaintiffs represent and warrant to Releasees that they are authorized and entitled to sign this Agreement, that no other person or entity has any interest in the matters released in this Agreement, and that they own and have not sold, pledged, hypothecated, assigned or transferred nor purported to sell, pledge, hypothecate, assign or transfer to any person or entity all or any portion of the matters or claims released in this Agreement, and that they will defend, indemnify and hold harmless Releasees from any such claim that may be asserted against them by any other person or entity.

9. Indemnity. Plaintiffs agree to defend, indemnify and hold harmless Releasees for all costs, including reasonable attorney's fees, for defense or payment of any claims brought by any third party on its own behalf or on behalf of Plaintiffs, regarding the subject matter described in Paragraph One of this Agreement.

10. Careful Review of Agreement and Understanding of Release and Tax Obligations. The parties represent that they have CAREFULLY read this Agreement, and understand its terms and conditions without reservation. The parties acknowledge

that they have had ample opportunity to consult with the legal counsel of their choice regarding this Agreement, that they have not relied on any representations or statements of the other party or their counsel with respect to the subject matter of this Agreement, that they understand that this is a FULL, COMPLETE and FINAL Release and that they are forever relinquishing and releasing any and all claims they have or may have against each other involving the subject matter described in this Agreement.

Plaintiffs further acknowledge that Releasees do not warrant or represent any tax consequences of this Agreement, and is relying on his own legal and/or tax advisors and not on Releasees in that regard. Plaintiffs agree and understand that payments made under the Agreement may be subject to reporting to the relevant governmental authority responsible for the imposition of any Federal, California, local, gross receipts, sales, use, license, excise, franchise, employment, payroll, withholding tax or other exaction (collectively "taxes"), as required by Federal, California, and/or City law. The Plaintiffs shall provide the Releasees the requested and applicable forms, documents, information, reports, statements, and/or identifying information in order for the Releasees to fulfill their reporting obligations. The parties further agree and understand that the Releasees shall withhold (and remit to the relevant governmental authority) from such payments any taxes as may be required to be withheld pursuant to any applicable Federal, California, and/or City law or regulation, unless otherwise exempted by such applicable law, regulation, and evidence of exemption.

11. Severability. If any portion or portions of this Agreement may be held by a court of competent jurisdiction to conflict with any federal, state or local law, and as a

result such portion or portions are declared to be invalid and of no force or effect in such jurisdiction, all remaining provisions of this Agreement shall otherwise remain in full force and effect and be construed as if such invalid portion or portions had not been included herein.

12. Action Against Releasees. Plaintiffs agree never to commence, encourage, prosecute or cause to be prosecuted against Releasees any complaint, suit or proceedings based on a claim, demand, cause of action, damage or liability which is the subject matter of this Agreement, or upon any other fact or assertion relating to any aspect of claims which Plaintiffs asserted, or could have asserted against Releasees in this Lawsuit. Plaintiffs further agree never to advise or encourage any entity or person in bringing or prosecuting against Releasees, any complaint, suit or proceedings based on a claim, demand, cause of action, damage or liability which is the subject matter of this Agreement, or any similar claim or proceeding on behalf of any other entity or person, or upon any other fact or assertion relating to any aspect of claims which Plaintiffs asserted, or could have asserted against Releasees in this Lawsuit.

13. Governing Law. This Agreement shall be deemed to be entered into and performed in the County of Los Angeles, State of California, and shall be interpreted under the laws of the State of California.

14. Counterparts. This Agreement may be signed in several counterparts, but all when taken together shall constitute but a single document when executed by all parties.

15. Facsimile Signatures. The parties acknowledge and agree that facsimile signatures are acceptable and have the same force and effect as an original signature.

16. Entire Agreement. The parties acknowledge and agree that no representations or promises have been made to or relied upon by them or by any person acting for or on their behalf in connection with the subject matter of this Agreement which are not specifically set forth herein. All representations and promises made by any party to another, whether in writing or orally, are understood by the parties to be merged in this Agreement.

17. Binding Effect. This Agreement shall be binding upon and shall inure to the benefit of the parties, their respective heirs, beneficiaries, personal representatives, successors and assigns.

18. Amendments. This Agreement and all documents and instruments executed in connection with this Agreement or in furtherance of this Agreement may not be amended, modified or supplemented except by an instrument in writing signed by all parties to this Agreement.

19. Further Assurances. Each party agrees to execute such further and additional documents, instruments and writings as may be necessary, proper, required, desirable or convenient for the purpose of fully effectuating the terms and provisions of this Agreement, including but not limited to a Request for Dismissal with Prejudice of the Lawsuit.

IN WITNESS HEREOF, the parties have executed this Settlement Agreement on the date written below.

CAUTION:

READ BEFORE SIGNING:

I AFFIRM THAT I AM AT LEAST 18 YEARS OF AGE. I HAVE READ ALL OF THIS RELEASE AND SETTLEMENT AGREEMENT. I UNDERSTAND ALL PARAGRAPHS CONTAINED HEREIN. I STATE THAT I AM SIGNING THIS RELEASE AND SETTLEMENT AGREEMENT AS MY OWN FREE ACT AND DEED.

DATED: March 9, 2020

Dr. Stewart Lucas Murrey, Releasing Party

DATED: March __, 2020 **MICHAEL N. FEUER**, City Attorney
KATHLEEN A. KENEALY, Chief Asst. City Attorney
SCOTT MARCUS, Chief, Civil Litigation Branch
CORY M. BRENTE, Senior Assistant City Attorney

By: _____
NICHOLAS LAUBER, Deputy City Attorney
Attorneys for Defendant **CITY OF LOS ANGELES**

SUPERIOR COURT OF THE STATE OF CALIFORNIA

CENTRAL DISTRICT OF CALIFORNIA

DR. STEWART LUCAS MURREY, an individual, Plaintiff, VS. CITY OF LOS ANGELES, a municipality; LOS ANGELES POLICE DEPARTMENT, a governmental entity; Stevens, an individual; Andrews, an individual; Kerry Young, an individual; C. Halshishak, an individual; B. Royer, an individual; Salazar, an individual; and DOES 1 through 50, inclusive, Defendants.	Case No. 2:19-cv-02501-FMO-AS

CERTIFIED COPY

DEPOSITION OF YOLANDA THUNDERWOLF

Los Angeles, California

Tuesday, March 3, 2020

Reported by:

JUSTYNE JOHNSON,
CSR No. 14301

Job No.:
26390CAT

I N D E X

EXAMINATION BY:	PAGE
MR. LAUBER	5

E X H I B I T S

EXH. NO	DESCRIPTION	PAGE
1	Affidavit/will of Sherrie Martinez	18
2	Advanced Healthcare Directive	27
3	Uniform Statutory Form of Power of Attorney	32

Los Angeles, California, Tuesday, March 3, 2020
10:21 a.m.

YOLANDA THUNDERWOLF,
called as a witness, and having been first duly sworn by the Certified Shorthand Reporter, was examined and testified as follows:

THE WITNESS: Yes, I do.

EXAMINATION

BY MR. LAUBER:

Q All right. So good morning, Ms. Thunderwolf.

A Good morning.

Q I'm going to go over some ground rules for a deposition.

A Okay.

Q So just -- have you ever had your deposition taken before?

A This is my second one.

Q Okay. So I'm going to go over some things since this is relatively new to you.

A Mm-hmm.

Q So the oath that you just took --

A Mm-hmm.

Q Okay. And have you ever worked in a law office?
A Never.
Q Okay. Could you just take me through the steps of notarizing a document?
A Well, when somebody calls me, I go to their place of business or home, and they'll give me a document. Could be any document, and I'll get their ID, make sure that they're competent to sign, or I'll ask them, "Do you know what your signing," and notarize the document and log it in my journal.
Q Okay. So who reached out to you to get you to notarize documents for Sherrie Martinez?
A Well, I work with this other notary. She's a Santa Monica notary. We're like a team, so she calls me in -- in the morning -- that morning and told me to rush to this one job. You know, sometimes we get rush jobs. So I called -- I said, "Okay. I'll -- I'll go." I have to be there at 9:45 in the morning, and I went straight to the job in Venice.
Q Okay. And was that the same -- you got notified the same day that you went --
A That same morning. That morning. We got -- we got.
THE STENOGRAPHER: Just let him finish, please.
THE WITNESS: Oh, I'm sorry.

BY MR. LAUBER:

Q You got notified the same day that you notarized the documents?

A Yes.

Q Okay. And had you ever met Stewart Lucas Murrey prior to March 9th, 2018?

A No.

Q And what -- what time were you contacted to go to that location?

A I don't even remember. Because I don't have my texts. I save all my texts, but I have a new phone now. I want to say she called me maybe between 7:30 and 8:00 o'clock.

Q Okay?

A So I only had -- because I live in the valley, so I had maybe, I don't know, less than an hour to get there.

Q And what location did you go to?

A I went to an apartment in -- in Venice.

Q Okay. And was that, like, a residence?

A Yes. It was an apartment building. Yeah.

Q Okay. And when you got there, who was there?

A Mr. Murrey and -- and Sherrie.

Q Okay. And what condition was Ms. Martinez in when you got there?

A Well, she was asleep, and he woke her up.

Q Okay. So when you got there, who answered the door?
A He did.
Q Okay.
A Mr. Murrey.
Q Okay. And aside from her being awake, did you notice anything else about her condition?
A She -- well, she looked sick. I mean, she -- I could tell she had just woken up. Her -- she looked like she just woke up.
Q Okay. Was she -- did she appear to be in pain at all?
A I -- I think she was in pain.
Q Okay. Why do you think that?
A Just the -- her demeanor. The way she looked.
Q Okay. And was she alert?
A She was half alert because she was just woken up.
Q Okay. Was she able to sit up?
A He helped her sit up.
Q When you say "he" --
A Dr. Murrey. She was lying [sic] on the couch.
Q Okay. And was she able to use her arms and hands?
A She was able to use her hands, yes.
Q Okay.

A Yes.
Q Was she able to use her arms?
A Well, yeah, because she was signing. Yeah.
Q Okay. And what condition was Dr. Murrey in when you got there?
A I don't remember. I -- I don't -- I don't -- I can't remember. He was just --
Q Okay.
A -- there.
Q And at the time of the notarization, was Dr. Murrey in the room?
A Yes.
Q Okay.
A Yes.
Q And how many documents did you notarize?
A Three.
Q Three? And what were those documents?
A One was a -- a letter or, like, an affidavit. It was, like, a typed up letter. A short letter.
Q Okay.
A Affidavit will, I guess you could call it. A Power of Attorney, and a health directive.
Q Okay. Did you attempt to assess whether Ms. Martinez was competent to sign the documents?
A Yes.

Q How did you do that?
A Just looking at her, and when I was looking at the documents -- that was in the kitchen in the area and just by observing her.
Q Okay. Did she -- you said she was asleep on the couch when you came in?
A Yes.
Q And did she get up from the couch at any point while you were there?
A No. She's -- he pick -- lifted her up to sit down.
Q Okay.
A And -- but she never woke -- she never got up when I was there.
Q Mm-hmm.
A And I never sat down.
Q And why did you attempt to determine if Ms. Martinez was competent to sign the documents?
A Why?
Q Yes.
A Because if you're going to sign legal documents, you have to be competent.
Q Okay. Is that something you're required to do as a notary?
A Right. If they're -- if they don't know what

they're doing or signing, I -- I can't proceed with the notary.

Q Okay. And did you have any concerns about proceeding with the notarization?

A I had slight because when he woke her up and I knew she was sick because the notary that I work for -- the work -- the notary who I work with, I mean, called me that morning to say go there -- there. The woman's really sick, and I'm like okay.

Q Okay. And was -- why was that a concern to you?

A Because if somebody's really sick, maybe she's not going to be competent to sign.

Q Okay.

A That's the only thing I would think of.

Q Other then what your coworker had said, was there any other reason for you to think --

A No.

Q -- that she was not competent?

A No, because we get call sometimes, and it's like a rush job. And sometimes I'll do them, sometimes I won't. You know, just depending on the situation.

Q Okay. Did Ms. Martinez present you with any identification?

A Yes.

Q Okay. And did she present it, or did someone

else present it?
A Oh.
Q If you remember.
A She didn't. I know she di- -- I -- I think Dr. Murrey gave me her driver's license.
Q Okay. And was it a California driver's license?
A It was a California driver's license.
Q Okay. Did that identification bear a signature on it?
A Yes.
Q Okay. And so I want to talk about, first, you said there was a typewritten document?
A It was a typewritten document.
MR. LAUBER: Okay. I'm going to mark this as Exhibit 1 to the deposition. Place a one on the back and circle it. Provide you a copy.
(Exhibit 1 was marked for identification by the Certified Shorthand Reporter and is attached hereto.)
DR. MURREY: Thank you. Do you -- she's going to get a copy?
THE WITNESS: I have --
MR. LAUBER: I'm going to hand it to her. Okay. So I've provided a copy to Dr. Murrey, and I'm going to show a copy to Ms. Thunderwolf.
THE WITNESS: Mm-hmm.

MR. LAUBER:
Q Ma'am, do you recognize this?
A Yes.
Q Okay. And what is this?
A This is the letter that I notarized.
Q Okay.
A The letter -- affidavit. I put it in my book "affidavit/will" because I didn't know what to name it.
Q Okay. And was this typewritten prior to your arrival?
A Yes.
Q Okay. And where was this document at when you arrived?
A The documents were all on the kitchen counter.
Q Okay.
A I was in the kitchen and the -- the documents were on the counter.
Q Okay. And what's the dif- -- the -- the distance from the kitchen counter to the couch where Ms. Martinez was sitting -- seated -- seated?
A Well, I know it's a small kitchen, and there was like a counter. So here's the counter (indicating) and the -- I walked around (indicating). The couch was somewhere over here (indicating). Maybe a few feet.
Q Okay. Was there a clear view from the counter to

EXHIBIT 9

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	CV 20-6217 PA (SKx)	Date	December 16, 2020
Title	Stewart Murrey v. Aaron Minc, et al.		

Present: The Honorable	PERCY ANDERSON, UNITED STATES DISTRICT JUDGE	
Gabriela Garcia	Not Reported	N/A
Deputy Clerk	Court Reporter	Tape No.
Attorneys Present for Plaintiffs:	Attorneys Present for Defendants:	
None	None	

Proceedings: IN CHAMBERS — COURT ORDER

Plaintiff Stewart Murrey, PhD ("Plaintiff"), who is appearing pro se, has filed a Reply in support of his Ex Parte Application for Expedited Discovery and to Extend Time for Service (Docket No. 57). The Court's Standing Orders states: "Absent leave of Court, the Court will not consider reply papers in support of an ex parte application."

Plaintiff did not obtain leave of Court to file his Reply in support of his Ex Parte Application. Nor do the issues raised in the Ex Parte Application, and the Opposition to that Ex Parte Application filed by defendants Brandyourself.com Inc., Christian Tryon, and Tom Vitolo, merit the additional argument contained in Plaintiff's Reply. The Court again warns the parties, as it did in its December 3, 2020 Minute Order, that future violations of the Local Rules, Federal Rules of Civil Procedure, and the Court's Orders may result in the imposition of sanctions.

IT IS SO ORDERED.

JS-6

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

DR. STEWART LUCAS MURREY, Plaintiff, v. AARON MINC, et al., Defendants.	CV 20-6217 PA (SKx) JUDGMENT OF DISMISSAL

Pursuant to the Court's December 18, 2020 Minute Order granting the Motions to Dismiss for Lack of Personal Jurisdiction filed by defendants Domingo Rivera ("Rivera"), Rivera Law Group PLC ("Rivera Law"), Internet Reputation Control ("IRC"), PRVT LLC ("PRVT"), Aaron Minc ("Minc"), Minc Law ("Minc Law"), Anthony Will ("Will"), and Digital Revolution LLC (also known as Reputation Resolutions) ("Digital Revolution"), the Court's December 28, 2020 Minute Order dismissing defendant Elizabeth Jordan without prejudice pursuant to Federal Rule of Civil Procedure 4(m), and the Court's January 13, 2021 Minute Order transferring the claims asserted against defendants Brandyourself.com, Inc., Tom Vitolo, and Christian Tryon,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that plaintiff Stewart Murrey's ("Plaintiff") claims against Rivera, Rivera Law, IRC, PRVT, Minc, Minc Law, Will, Digital Revolution, are dismissed without prejudice for lack of personal jurisdiction.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Plaintiff's claims against Elizabeth Jordan are dismissed without prejudice pursuant to Federal Rule of Civil Procedure 4(m).

DATED: January 13, 2021

Percy Anderson
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	CV 20-6217 PA (SKx)	Date	January 13, 2021
Title	Stewart Murrey v. Aaron Minc, et al.		

Present: The Honorable	PERCY ANDERSON, UNITED STATES DISTRICT JUDGE	
Gabriela Garcia	N/A	N/A
Deputy Clerk	Court Reporter	Tape No.
Attorneys Present for Plaintiffs:	Attorneys Present for Defendants:	
None	None	

Proceedings: IN CHAMBERS – COURT ORDER

Before the Court are a Motion to Transfer (Docket No. 51) and a Motion to Dismiss (Docket No. 63) filed by defendants Brandyourself.com, Inc., Christian Tryon, and Tom Vitolo (collectively the "Brandyourself Defendants"). Also before the Court is a Motion for Leave to File Second Amended Complaint filed by plaintiff Stewart Murrey, PhD ("Plaintiff") (Docket No. 60). Pursuant to Rule 78 of the Federal Rules of Civil Procedure and Local Rule 7-15, the Court finds these matters are appropriate for decision without oral argument. The hearing calendared for January 25, 2021, is vacated, and the matters taken off calendar.

I. Factual and Procedural Background

Plaintiff commenced this action on July 13, 2020, when he filed his Complaint against www.cheaterreport.com for defamation and violations of his statutory and common law publicity rights under California law. Because the original Complaint did not allege a statutory or other basis for the Court's exercise of subject matter jurisdiction as required by Federal Rule of Civil Procedure 8(a) and Local Rule 8-1, the Court dismissed the original Complaint with leave to amend. Plaintiff then filed the First Amended Complaint ("1st AC") on August 3, 2020, which dropped www.cheaterreport.com as a defendant, added 13 new defendants, and asserted RICO claims, plus claims for fraud, civil conspiracy, unfair business practices pursuant to California Business and Professions Code section 17200, and claims for violations of his publicity rights under California statutory and common law.

Plaintiff alleges that individuals who are not named as defendants in the 1st AC posted defamatory comments about him in 2016 and 2017 on www.cheaterreport.com. Plaintiff alleges that he contracted with individuals and entities, including Aaron Minc ("Minc"), Minc Law ("Minc Law") (collectively, the "Minc Defendants"), and Anthony Will ("Will") and Digital Revolution LLC (also known as Reputation Resolutions) (collectively, the "Will Defendants"), to provide reputation defense services and remove the defamatory information. Plaintiff also contracted with the Brandyourself Defendants to generate positive content concerning Plaintiff

to reduce the prevalence of the derogatory information in internet search results about him. The contract Plaintiff entered with the Brandyourself Defendants in February 2017 provided: "This agreement shall be governed by, and construed and enforced in accordance with, the laws of the State of Delaware, excluding conflict of laws principles, and all actions or proceedings arising in connection with this Agreement shall be tried and litigated exclusively in the federal or state courts located in New York, New York."

The 1st AC alleges that the Rivera Defendants operate and maintain www.cheaterreport.com. (1st AC at ¶ 30.) Plaintiff asserts that the defendants who provided reputation defense services have conspired with the Rivera Defendants, and other entities Plaintiff has sued or intends to add as defendants, to operate an extortion ring, through which those providing reputation defense services funnel money they obtain from those like Plaintiff who have been victimized by derogatory internet posts to the websites like www.cheaterreport.com, which publishes the defamatory material. Plaintiff, who has frequently stated in documents filed with the Court that he has a PhD from Yale and is a published scholar, has, in more recent filings, asserted that the conspiracy he describes in the 1st AC is broader than what he initially alleged. His Oppositions to the pending Motions to Dismiss, and other more recently-filed documents, for instance, include references to Jeffrey Epstein, Ghislane Maxwell, the CIA, Israeli and Saudi Arabian intelligence services, Amazon, Jeff Bezos, and others.

In their Motion to Transfer, the Brandyourself Defendants seek to enforce the venue provision contained in their contract with Plaintiff and transfer the claims asserted against them to the United States District Court for the Southern District of New York. The Brandyourself Defendants' Motion to Dismiss challenges the sufficiency of the 1st AC's claims.

In a December 18, 2020 Minute Order, the Court granted the Motions to Dismiss for Lack of Personal Jurisdiction filed by the Rivera Defendants, Will Defendants, and Minc Defendants. On December 28, 2020, the Court dismissed defendant Elizabeth Jordan pursuant to Federal Rule of Civil Procedure 4(m) as a result of Plaintiff's failure to timely serve her with the Summons and operative 1st AC. The result of those two orders is that the Brandyourself Defendants are the only remaining defendants before the Court. Plaintiff, however, has filed a Motion for Leave to File Second Amended Complaint, in which he seeks to add www.cheaterreport.com, after previously and voluntarily dropping www.cheaterreport.com as a defendant, and a Doe internet protocol ("IP") address associated with www.cheaterreport.com as defendants, along with several Amazon entities, who apparently host the www.cheaterreport.com website, and Cloudfare, Inc., which Plaintiff believes has provided internet domain registration services to www.cheaterreport.com.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	CV 20-6217 PA (SKx)	Date	January 13, 2021
Title	Stewart Murrey v. Aaron Minc, et al.		

II. Motion to Transfer to Enforce Forum Selection Clause

"When venue is challenged, the court must determine whether the case falls within one of the three categories set out in [28 U.S.C.] § 1391(b). If it does, venue is proper; if it does not, venue is improper, and the case must be dismissed or transferred under § 1406(a). Whether the parties entered into a contract containing a forum-selection clause has no bearing on whether a case falls into one of the categories of cases listed in § 1391(b). As a result, a case filed in a district that falls within § 1391 may not be dismissed under § 1406(a) or Rule 12(b)(3)." Atlantic Marine Const. Co. v. U.S. Dist. Court, 571 U.S. 49, 56, 134 S. Ct. 568, 577, 187 L. Ed. 2d 487 (2013).

Under 28 U.S.C. § 1404(a), a court may transfer an action "to any other district where it might have been brought" "[f]or the convenience of parties and witnesses, [and] in the interest of justice." The section 1404 transfer analysis has two steps: (1) determining whether the district to which the moving party seeks to transfer meets the requirement of being one where the case "might have been brought"; and (2) if it does, determining whether transfer would serve the convenience of parties and witnesses and the "interest of justice." See 28 U.S.C. § 1404(a). The "transferee court" must have subject matter jurisdiction, venue must be proper, and the defendants must be subject to personal jurisdiction. A court may transfer venue in response to a motion by either party in the case, or upon its own motion. See Muldoon v. Tropitone Furniture Co., 1 F.3d 964, 966 (9th Cir. 1993). However, "a transfer is inappropriate when it merely serves to shift inconveniences from one party to the other." Kahn v. Gen. Motors Corp., 889 F.2d 1078, 1083 (Fed. Cir. 1989) (quoting Weight Watchers Int'l, Inc. v. Stouffer Corp., No. 88 CIV 7062 (MBM), 1989 WL 73292, at *4 (S.D.N.Y. June 28, 1989)).

"Section 1404(a) . . . provides a mechanism for enforcement of forum-selection clauses that point to a particular federal district." Atlantic Marine, 571 U.S. at 59, 134 S. Ct. at 579. "When the parties have agreed to a valid forum-selection clause, a district court should ordinarily transfer the case to the forum specified in that clause." Id. at 62, 134 S. Ct. at 581. "[A] proper application of § 1404(a) requires that a forum-selection clause be 'given controlling weight in all but the most exceptional cases.'" Id. at 59-60, 134 S. Ct. at 579 (quoting Stewart Org., Inc. v. Ricoh Corp., 487 U.S. 22, 33, 108 S. Ct. 2239, 101 L. Ed. 2d 22 (1988) (Kennedy, J., concurring)).

"The presence of a valid forum-selection clause requires district courts to adjust their usual § 1404(a) analysis in three ways." Id. at 63, 134 S. Ct. at 581. "First, the plaintiff's choice of forum merits no weight," and instead "the plaintiff bears the burden of establishing that transfer to the forum for which the parties bargained is unwarranted." Id. at 63, 134 S. Ct. at

581. Second, the court "should not consider arguments about the parties' private interests. When parties agree to a forum-selection clause, they waive the right to challenge the preselected forum as inconvenient or less convenient for themselves or their witnesses, or for their pursuit of the litigation." Id. at 64, 134 S. Ct. at 582. Finally, "a § 1404(a) transfer of venue will not carry with it the original venue's choice-of-law rules—a factor that in some circumstances may affect public-interest considerations." Id. Upon transfer, "[t]he court in the contractually selected venue should not apply the law of the transferor venue to which the parties waived their right." Id. at 65-66, 134 S. Ct. at 583.

Federal law determines the validity and enforceability of a forum-selection clause. See Doe 1 v. AOL LLC, 552 F.3d 1077, 1083 (9th Cir. 2009) Doe 1, 552 F.3d at 1083; LaCross v. Knight Transp., Inc., 95 F. Supp. 3d 1199, 1203 (C.D. Cal. 2015). "[F]orum section clauses are presumptively valid." Murphy v. Schneider Nat'l, Inc., 362 F.3d 1133, 1140 (9th Cir. 2004) (discussing Bremen v. Zapata Off-Shore Co., 407 U.S. 1, 92 S. Ct. 1907, 32 L. Ed. 2d 513 (1972); and citing Spradlin v. Lear Siegler Mgmt. Servs. Co., 926 F.2d 865, 868 (9th Cir. 1991)). "The party challenging the clause bears a 'heavy burden of proof' and must 'clearly show that enforcement would be unreasonable and unjust, or that the clause was invalid for such reasons as fraud or over-reaching.'" Id. (quoting Bremen, 407 U.S. at 15). There are "three reasons that would make enforcement of a forum selection clause unreasonable: (1) 'if the inclusion of the clause in the agreement was the product of fraud or overreaching'; (2) 'if the party wishing to repudiate the clause would effectively be deprived of his day in court were the clause enforced'; and (3) 'if enforcement would contravene a strong public policy of the forum in which suit is brought.'" Id. (quoting Richards v. Lloyd's of London, 135 F.3d 1289, 1294 (9th Cir. 1998)); see Petersen v. Boeing Co., 715 F.3d 276, 280 (9th Cir. 2013). "[A] party opposing enforcement of a forum selection clause must show that the inclusion of the forum clause itself was the product of fraud or overreaching." Joseph v. Amazon.com, Inc., No. C12-06256 HRL, 2013 WL 4806462, at *5 (citing Richards, 135 F.3d at 1297); see also Batchelder v. Kawamoto, 147 F.3d 915, 919 (9th Cir. 1998).

Plaintiff spends a portion of his Opposition discussing the propriety of the Court's exercise of personal jurisdiction over the Brandyourself Defendants, but the Brandyourself Defendants do not challenge the Court's exercise of personal jurisdiction over them. Instead, they seek to enforce the terms of the forum selection clause contained in the contract Plaintiff entered with them. Nor do Plaintiff's insistence that his choice of forum be entitled to deference, or that the convenience of the parties weighs in favor of the Central District as the appropriate forum, provide a basis for disregarding the forum selection clause contained in the contract he signed with the Brandyourself Defendants.

Plaintiff seeks to escape the consequences of the forum selection clauses contained in the contract he entered with the Brandyourself Defendants by asserting that he "only became aware of Brandyourself.com, Inc. After he was extorted and targeted with advertisements in California by [by the Will Defendants] who then, in turn, directly [sic] plaintiff to Brandyourself.com, Inc. And with whom Will and Reputation Resolutions are partnered." (Opp'n at 10:10-17 (Docket No. 67).) Plaintiff, a Yale-educated scholar with an advanced degree, has not provided any evidence to support his contention that the forum selection clauses are unenforceable as a result of fraud or "extortion." Plaintiff has not alleged that the Brandyourself Defendants threatened Plaintiff. Moreover, even if the Brandyourself Defendants defrauded Plaintiff as he contends, Plaintiff has provided no evidence that the inclusion of the forum selection clause itself was the result of fraud. See Richards, 135 F.3d at 1297. Nor has Plaintiff otherwise met his "heavy burden" to call into question the presumption of validity of the forum selection clause or established that he would be deprived of his day in court or that public policy would be contravened should the forum selection clause be enforced. See Murphy, 362 F.3d at 1140. The Court therefore concludes that the Brandyourself Defendants' forum selection clause encompasses Plaintiff's claims against the Brandyourself Defendants and is otherwise valid and enforceable. As a result, the Court grants the Brandyourself Defendants' Motion to Transfer and transfers the claims asserted by Plaintiff against the Brandyourself Defendants to the United States District Court for the Southern District of New York.

III. Brandyourself Defendants' Motion to Dismiss

Because the Court concludes that Plaintiff and the Brandyourself Defendants agreed to litigate this dispute in the United States District Court for the Southern District of New York, the Court declines to address the Brandyourself Defendants' Motion to Dismiss. The Motion to Dismiss should be addressed in the first instance by the United States District Court for the Southern District of New York.

IV. Motion for Leave to File Second Amended Complaint

Federal Rule of Civil Procedure 15 provides for amendment to a party's pleading by leave of the court at any time, and such leave "shall be freely given when justice so requires." Fed. R. Civ. P. 15(a); DCD Programs, Ltd., v. Leighton, 833 F.2d 183, 186 (9th Cir. 1987) (noting that leave to amend should be granted with "extreme liberality" to "facilitate decision on the merits rather than on pleadings or technicalities"). The Court considers five factors in assessing a motion for leave to amend: "bad faith, undue delay, prejudice to the opposing party, futility of amendment, and whether the plaintiff has previously amended the complaint." Johnson v. Buckley, 356 F.3d 1067, 1077 (9th Cir. 2004). "Undue delay by itself, however, is insufficient

to justify denying a motion to amend." Bowles v. Reade, 198 F.3d 752, 758 (9th Cir. 1999); see also Eminence Capital, LLC v. Aspeon, Inc., 316 F.3d 1048, 1052 (9th Cir. 2003) ("Absent prejudice, or a strong showing of any of the remaining . . . factors, there exists a presumption under Rule 15(a) in favor of granting leave to amend."). In this context, "a proposed amendment is futile only if no set of facts can be proved under the amendment to the pleadings that would constitute a valid and sufficient claim or defense." Miller v. Rykoff-Sexton, Inc., 845 F.2d 209, 214 (9th Cir.1988). In other words, "[t]he court can deny the motion to amend on the basis of futility either if the amended complaint would be dismissed under Rule 12(b)(6), or if plaintiff fails to plead with requisite specificity under Rule 9(b)." In re Fritz Cos. Sec. Litig., 282 F. Supp. 2d 1105, 1111 (N.D. Cal. 2003) (citations omitted); see also Miller, 845 F.2d at 214 ("'[The] proper test to be applied when determining the legal sufficiency of a proposed amendment is identical to the one used when considering the sufficiency of a pleading challenged under Rule 12(b)(6).'") (quoting 3 James Wm. Moore, Moore's Federal Practice ¶ 15.08[4] (2d ed. 1974)).

The Central District's Local Rules require that "[a]ny proposed amended pleading must be filed as an attachment to the related motion or stipulation." Local Rule 15-1. Plaintiff, however, did not attach a copy of his proposed Second Amended Complaint to his Motion. Based upon his Reply, in which he responds to the Brandyourself Defendants' having pointed out this failure to comply with Local Rule 15-1, it is clear the Plaintiff has not prepared his proposed Second Amended Complaint. Plaintiff has therefore deprived the Court of the ability to assess whether the allegations against the Amazon entities and Cloudfare, Inc. he seeks to add to his proposed Second Amended Complaint, who appear to have done nothing more than provide web hosting and domain registration services, satisfy the relevant pleading standards. The Court additionally notes that Plaintiff appears to seek to add new claims against www.cheaterreport.com despite having initially named www.cheaterreport.com as a defendant in his original Complaint and then voluntarily dropping that defendant more than five months ago. The Court therefore concludes that applying Rule 15's liberal standard, Plaintiff has failed to satisfy the requirements for leave to file his proposed Second Amended Complaint. As a result, the Court denies Plaintiff's Motion for Leave to File Second Amended Complaint.

Conclusion

For all of the foregoing reasons, the Court grants the Brandyourself Defendants' Motion to Transfer and declines to address the Brandyourself Defendants' Motion to Dismiss. Plaintiff's claims against Brandyourself.com, Inc., Tom Vitolo, and Christian Tryon are transferred to the United States District Court for the Southern District of New York. The Court denies Plaintiff's Motion for Leave to File Second Amended Complaint. Having dismissed the

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	CV 20-6217 PA (SKx)	Date	January 13, 2021
Title	Stewart Murrey v. Aaron Minc, et al.		

Rivera Defendants, Minc Defendants, and Will Defendants for lack of personal jurisdiction, dismissed Elizabeth Jordan as a defendant pursuant to Federal Rule of Civil Procedure 4(m), transferred the claims against the Brandyourself Defendants to the United States District Court for the Southern District of New York, and denied Plaintiff's Motion for Leave to File Second Amended Complaint, there are no remaining claims or defendants pending in this Court. The Court will therefore issue a Judgment consistent with this Order and the Court's December 18, 2020, and December 28, 2020 Orders.

IT IS SO ORDERED.

EXHIBIT 10

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/23/2022

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DR. STEWART LUCAS MURREY,	:	
	:	**REPORT AND**
Plaintiff,	:	**RECOMMENDATION**
	:	
	:	21-CV-320 (AT) (JLC)
-v.-	:	
	:	
BRANDYOURSELF.COM, INC., TOM VITOLO, and CHRISTIAN TRYON,	:	
	:	
Defendants.	:	

JAMES L. COTT, United States Magistrate Judge.

To The Honorable Analisa Torres, United States District Judge:

Dr. Stewart Lucas Murrey, proceeding *pro se*, brought this action, *inter alia*, against BrandYourself.com, Inc., Tom Vitolo, and Christian Tryon, alleging that they were involved in a conspiracy to publish negative and harmful information about him on the Internet.[1] Pending before the Court is Murrey's motion to further amend his complaint, and to transfer this case back to the Central District of California, where he had originally filed it in 2020. For the reasons set forth below, leave to amend the first amended complaint should be denied, and the motion to transfer should be denied as moot. Additionally, to the extent BrandYourself.com, Inc., Tom Vitolo, and Christian Tryon seek clarification of the Court's June 3, 2022 order, the claims against them should be dismissed with prejudice.

[1] Murrey had sued other defendants as well, who were all previously dismissed. These three are the remaining defendants.

I. BACKGROUND

This action arises out of Murrey's allegations that beginning in late 2016, a series of defamatory comments were posted about him on the website www.cheaterreport.com ("Cheaterreport") and the posts harmed his reputation, harmed his ability to earn money, and led him to being falsely arrested twice. First Amended Complaint ("FAC") ¶¶24–28, Dkt. No. 9. Murrey further alleged that he hired BrandYourself.com ("BrandYourself"), Tom Vitolo, and Christian Tryon (together, the "BrandYourself Defendants") to improve his online presence and reputation, but instead they worked together with Cheaterreport to publish negative information about him on the Internet. FAC ¶28.[2]

Murrey originally filed this action in the Central District of California on July 13, 2020, against Cheaterreport and Does 1 through 10. Complaint, Dkt. No. 1. On July 16, 2020, the Honorable Percy Anderson dismissed the complaint for lack of subject matter jurisdiction with leave to amend, Dkt. No. 7, and on August 3, 2020, Murrey filed the FAC, the operative complaint. On December 18, 2020 and December 28, 2020, the claims were dismissed against all defendants except for the BrandYourself Defendants. Dkt. Nos. 62, 66. Judge Anderson then transferred the case to the Southern District of New York on January 13, 2021, due to a forum selection provision in the contract between Murrey and the BrandYourself Defendants. Dkt. No. 75. On June 3, 2022, Judge Torres dismissed the FAC but

[2] As Judge Torres previously issued a decision in this case summarizing the relevant factual background in greater detail (Dkt. No. 99), the Court incorporates that summary by reference and will not repeat it here.

allowed Murrey until July 6, 2022 to file a motion for leave to further amend his pleadings. Dkt. No. 99.

On July 6, 2022, Murrey timely moved for leave to amend and attached his proposed second amended complaint ("PSAC"). Notice of Motion to File an Amended Complaint, Dkt. No. 100.[3] On July 8, 2022, Murrey moved to transfer the action back to the Central District of California ("Trans. Mot."). Notice of Motion to Transfer Pursuant to 28 U.S.C. §1404(a), Dkt No. 102. On July 20, 2022, the BrandYourself Defendants filed a response to Murrey's motion to amend. Dkt. No. 105. On July 25, 2022, Murrey filed reply papers. Dkt. No. 106. On July 12, 2022, Judge Torres referred the motions to me. Dkt. Nos. 101, 104.[4]

[3] The Notice of Motion to File an Amended Complaint filed on July 11, 2022, at docket number 103, appears to be the same as the motion at docket number 100, with the addition of a scanned copy of the envelope Murrey used to mail his motion papers to the Court.

[4] Both motions to amend and motions to transfer are classified as non-dispositive. *See, e.g., Fezzani v. Bear, Stearns & Co., Inc.*, No. 99-CV-793 (PAC) (JLC), 2022 WL 782751, at *1, n.1 (S.D.N.Y. Mar. 15, 2022) (collecting cases) (motions to amend non-dispositive in Second Circuit); *United States ex rel. Fisher v. Bank of Am., N.A.*, 204 F. Supp. 3d 618, 620 n.1 (S.D.N.Y. 2016) (motions to transfer non-dispositive). In this instance, in an abundance of caution, and because a denial of Murrey's request for leave to amend would be dispositive and result in the dismissal of his lawsuit, the Court is issuing a report and recommendation instead of an opinion. *See, e.g., Crenshaw v. Hamilton*, No. 08-CV-6186 (DGL) (JWF), 2012 WL 1565696, at *1, n.1 (W.D.N.Y. Mar. 30, 2012), *adopted by* 2012 WL 1565685 (Apr. 30, 2012) (citation omitted).

II. DISCUSSION

A. Standard of Review

1. Motion to Amend

Rule 15 of the Federal Rules of Civil Procedure governs the amendment of pleadings. Rule 15(a)(2) specifies that a district court "should freely give leave [to amend] when justice so requires." Fed. R. Civ. P. 15(a)(2). A court should deny leave to amend only where there is "undue delay, bad faith or dilatory motive on the part of the movant, repeated failure to cure deficiencies by amendments previously allowed, undue prejudice to the opposing party by virtue of allowance of the amendment, futility of amendment, etc." *Williams v. Citigroup Inc.*, 659 F.3d 208, 213–14 (2d Cir. 2011) (quoting *Foman v. Davis*, 371 U.S. 178, 182 (1962)). "Courts will find good reason to deny a request for leave to amend pursuant to Rule 15 where the proposed amendment is futile because, for example, it fails to state a viable legal claim or is time-barred." *Kleeberg v. Eber*, 331 F.R.D. 302, 314 (S.D.N.Y. 2019) (quotation marks omitted).

2. Motion to Transfer

Under the general venue provision, a civil action may be brought in:

> (1) a judicial district in which any defendant resides, if all defendants are residents of the State in which the district is located; (2) a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred . . . ; or (3) if there is no district in which an action may otherwise be brought as provided in this section, any judicial district in which any defendant is subject to the court's personal jurisdiction with respect to such action.

28 U.S.C. § 1391(b). For venue purposes, a "natural person" resides in the district

where the person is domiciled, and a defendant corporation generally resides "in any judicial district in which such defendant is subject to the court's personal jurisdiction with respect to the civil action in question." 28 U.S.C. §§ 1391(c)(1), (2). Where a state has more than one judicial district, a defendant corporation generally "shall be deemed to reside in any district in that State within which its contacts would be sufficient to subject it to personal jurisdiction if that district were a separate State." 28 U.S.C. § 1391(d).[5]

Even if venue is proper, the Court may still transfer claims "[f]or the convenience of the parties and witnesses, in the interest of justice." 28 U.S.C. § 1404(a). "District courts have broad discretion in making determinations of convenience under Section 1404(a) and notions of convenience and fairness are considered on a case-by-case basis." *D.H. Blair & Co. v. Gottdiener*, 462 F.3d 95, 106 (2d Cir. 2006) (citation omitted).

Determining whether transfer is appropriate is a two-step inquiry. First, courts are required to determine whether the case could have been brought in the proposed transferee district: if that district "has personal jurisdiction over the defendant and venue is proper there." *Nuss v. Guardian Life Ins. Co. of Am.*, No. 20-CV-9189 (MKV), 2021 WL 1791593, at *2 (S.D.N.Y. May 5, 2021). If that threshold issue is met, courts then consider the totality of the following factors: (1) the convenience of witnesses; (2) the convenience of the parties; (3) the locus of

[5] In a state with multiple districts, if there is no such district, "the corporation shall be deemed to reside in the district within which it has the most significant contacts." 28 U.S.C. § 1391(d).

operative facts; (4) the availability of process to compel the attendance of unwilling witnesses; (5) the location of relevant documents and relative ease of access to sources of proof; (6) the relative means of the parties; (7) the forum's familiarity with the governing law; (8) the weight accorded to a plaintiff's choice of forum; (9) trial efficiency; and (10) the interest of justice, based on the totality of the circumstances. *See, e.g., D.H. Blair & Co*, 462 F.3d at 106–07; *Keitt v. N.Y. City*, 882 F. Supp. 2d 412, 458–59 (S.D.N.Y. 2011).

B. Analysis

1. Leave to Amend Should be Denied

Murrey's request for leave to amend the FAC should be denied because he has not presented a cognizable claim. Murrey requests leave to file a second amended complaint in which he will bring claims solely against new defendants: the Federal Communications Commission (the "FCC") and Does 1–50, consisting of both persons and entities, the identity of which are currently unknown to Murrey. PSAC ¶¶ 28, 29. With regard to the FCC, Murrey proposes to allege violations of his rights pursuant to the Fourth and Fourteenth Amendments of the United States Constitution. *Id.* at ¶¶117, 125. However, the FCC is a federal agency and as such, has sovereign immunity. *See, e.g., Aliksanyan v. Verizon*, No. 17-CV-394 (MKB), 2018 WL 11415415, at *10 (E.D.N.Y. Mar. 31, 2018) (FCC is federal agency); s*ee also, e.g., Neira v. Fed. Bureau of Prisons*, No. 97-CV-1598 (EHN), 1998 WL 178818, at *3 (E.D.N.Y. Jan. 30, 1998) ("Claims against federal agencies and officials based on constitutional violations are barred because they are the equivalent of suits

against the United States, which is protected by sovereign immunity.") (citation omitted). Thus, any claims against the FCC would not be cognizable. *See, e.g.*, *Rudolph v. Dep't of Just.*, No. 19-CV-6661 (AMD) (LB), 2020 WL 376638, at *1 (E.D.N.Y. Jan. 23, 2020) (claim against federal agency dismissed because sovereign immunity not waived) (citations omitted).

With regard to Does 1–50, Murrey alleges that their "true identities are currently unknown" but that they participated in, and are in some way responsible for, "the illegal extortion scheme described herein." PSAC ¶29. Although Murrey does provide further allegations regarding Does 1–50's actions—they "posted severe defamation of [Murrey] on Cheaterreport and other related websites; . . . registered, operated, maintained and paid for Cheaterreport; . . . extorted [Murrey] directly and those to whom he lent money such as [his] girlfriend before she passed from cancer," among others, *see id.*, the allegations do not provide sufficient specificity regarding the identities of Does 1–50.[6] Accordingly, Murrey's motion to amend to add these

[6] Notably, many of the proposed allegations relate to activity that was alleged to have occurred on Cheaterreport. *See, e.g.,* PSAC ¶¶55 ("severe damages and harm incited by Cheaterreport e.g. when defendants used Cheaterreport defamation"); 60 ("postings on and publications by Cheaterrerport"); and 92 ("Defendants owned and operated a revenge-porn/shaming website [called] Cheaterreport"). However, in the proposed second amended complaint, Murrey, without explanation, did not name Cheaterreport as a defendant. In his original complaint, which was dismissed for lack of subject matter jurisdiction (*see* Dkt. No. 7), Murrey named Cheaterreport as a defendant, *see* Complaint, at 1, but then in his FAC, Murrey dropped Cheaterreport. On December 17, 2020, while the action was still in the Central District of California, Murrey moved for leave to file a second amended complaint to again include Cheaterreport as a defendant (*see* Dkt. No. 60), which Judge Anderson denied because Murrey failed to attach a proposed amended complaint and thus failed to satisfy the requirements of Local Rule 15-1 of the Central District of California. Dkt. No. 75.

defendants also fails. *See, e.g., In re Murphy*, 482 F. App'x 624, 627 (2d Cir. 2012) (addition of unidentified defendants would be futile where plaintiff had approximately three years to discover their identity); *see also, e.g., Murphy v. Grabo*, No. 94-CV-1684 (RSP) (GJD), 1998 WL 166840, at *1 (N.D.N.Y. Apr. 9, 1998) (request to include "Known and Unknown Defendants" was "properly denied").

In sum, while *pro se* litigants like Murrey are entitled to "special solicitude," and the Court shall construe a *pro se* pleading to raise "the strongest claims that it suggests," *Williams v. Priatno*, 829 F.3d 118, 122 (2d Cir. 2016) (citation omitted), Murrey's motion to further amend should be denied because he has not stated a cognizable claim, and his motion to transfer accordingly should be denied as moot.

2. In the Alternative, Murrey's Motion to Transfer Should be Granted

If the Court were to grant Murrey leave to file a second amended complaint, then the Court should grant Murrey's motion to transfer. Murrey brought this action in the Central District of California because he resides there. FAC ¶2. The case was only transferred to the Southern District of New York because the BrandYourself Defendants sought to enforce a forum selection clause in a contractual agreement it had with Murrey. Dkt. No. 75, at 5.

Now that the BrandYourself Defendants have been dismissed from the case (as Murrey himself points out, *see* Trans. Mot. at 1), and Murrey has not named them as defendants in his proposed second amended complaint, the action no longer has any connection to the Southern District of New York. The BrandYourself Defendants, having not been named in Murrey's proposed second amended

complaint, have not opposed Murrey's request to transfer. Although the defendants named in Murrey's proposed second amended complaint, the FCC and Does 1–50, have not been served and so they are not on notice of Murrey's request to transfer, "a court may [still] transfer a case *sua sponte* where such transfer would be '[f]or the convenience of parties and witnesses,' and 'in the interest of justice,' so long as the case is transferred to another 'district or division where it might have been brought.'" *Delgado v. Villanueva*, No. 12-CV-3113 (JMF), 2013 WL 3009649, at *3 (S.D.N.Y. June 18, 2013) (citing to 28 U.S.C. § 1404(a)). Because the Central District of California was the original venue for Murrey's claims, it would be proper for the case to be transferred back to that District if it is to proceed against the new defendants. *Delgado*, 2013 WL 3009649, at *3 (district court "shall" dismiss or transfer "a case laying venue in the wrong division or district" (citing to 28 U.S.C. § 1406(a))).

3. The BrandYourself Defendants Should be Dismissed With Prejudice

In response to Murrey's motion for leave to further amend his pleadings, the Brandyourself Defendants request that the Court dismiss Murrey's claims in his FAC against them with prejudice. Dkt. No. 105, at 6. To the extent they are seeking clarification of the Court's order dated June 3, 2022, the BrandYourself Defendants should be dismissed with prejudice. Murrey's proposed second amended complaint does not even name BrandYourself.com, Tom Vitolo, or Christian Tryon as defendants. Accordingly, since Murrey has already amended his complaint once, and his new proposed amended complaint does not assert a claim against them,

dismissal with prejudice is appropriate. *See, e.g., Porter v. Gummerson,* No. 04-CV-988 (TJM) (DRH), 2007 WL 446026, at *4–5 (N.D.N.Y. Feb. 8, 2007) (where *pro se* plaintiff "abandoned" claims against defendants, those claims were dismissed with prejudice).

III. CONCLUSION

For the reasons stated herein, leave to amend should be denied, the motion to transfer should be denied as moot, and the BrandYourself Defendants should be dismissed with prejudice.

PROCEDURE FOR FILING OBJECTIONS

Pursuant to 28 U.S.C. § 636(b)(1) and Rule 72(b) of the Federal Rules of Civil Procedure, the parties have fourteen (14) days (including weekends and holidays) from service of this Report and Recommendation to file any objections. *See* Fed. R. Civ. P. 6(a), (b), (d). A party may respond to any objections within fourteen (14) days after being served. Fed. R. Civ. P. 72(b)(2). Such objections, and any responses to objections, shall be filed with the Clerk of Court, with courtesy copies delivered to the chambers of the Honorable Analisa Torres and the undersigned, United States Courthouse, 500 Pearl Street, New York, New York 10007. Any requests for an extension of time for filing objections must be directed to Judge Torres.

FAILURE TO FILE OBJECTIONS WITHIN FOURTEEN (14) DAYS WILL RESULT IN A WAIVER OF OBJECTIONS AND WILL PRECLUDE APPELLATE REVIEW. 28 U.S.C. § 636(b)(1); Fed. R. Civ. P. 72. *See Thomas v.*

Arn, 474 U.S. 140 (1985); *Wagner & Wagner, LLP v. Atkinson, Haskins, Nellis, Brittingham, Gladd & Carwile, P.C.*, 596 F.3d 84, 92 (2d Cir. 2010).

If Murrey does not have access to cases cited herein that are reported on Westlaw, he should request copies from counsel for the Brandyourself Defendants. *See Lebron v. Sanders*, 557 F.3d 76, 79 (2d Cir. 2009); Local Civil Rule 7.2, Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.

Dated: New York, New York
September 23, 2022

JAMES L. COTT
United States Magistrate Judge

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 6/3/2022

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DR. STEWART LUCAS MURREY,

Plaintiff,

-against-

AARON MINC, an individual, MINC Law, a business entity; DOMINGO J. RIVERA, an individual; RIVERA LAW GROUP, PLC a.k.a. DOMINGO J. RIVERA, ATTORNEY AT LAW, PLC, a limited liability company; PRVT L.L.C, a limited liability company, ELIZABETH JORDAN, an individual; INTERNET REPUTATION CONTROL a.k.a. IRC, a business entity; ANTHONY WILL, an individual; DIGITAL REVOLUTION LLC a.k.a. REPUTATION RESOLUTIONS, a business entity; BRANDYOURSELF.COM, INC., a limited liability company, TOM VITOLO, an individual; CHRISTIAN TYRON, an individual; and JOHN DOE NUMBERS 1-10,

Defendants.

21 Civ. 320 (AT) (JLC)

ORDER

ANALISA TORRES, District Judge:

Plaintiff *pro se*, Stewart Murrey, brings claims against Defendants Aaron Minc, Minc Law, Domingo J. Rivera, Rivera Law Group, PLC, PRVT L.L.C., Elizabeth Jordan, Internet Reputation Control, Anthony Will, Digital Revolution LLC, Brandyourself.com, Inc., Tom Vitolo, Christian Tyron, and John Does 1–10 for violations of the Racketeer Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. § 1962; California's unfair competition law (the "UCL"), Cal. Bus. & Prof. Code § 17200 *et seq*.; and California's statutory and common law right of publicity; and claims for common law fraud and civil conspiracy.[1] On December 22,

[1] On July 13, 2020, Plaintiff filed this action in the Central District of California, suing www.cheaterreport.com and Does 1 through 10 for defamation and violations of California's statutory and common law right of publicity. ECF No. 1. The Honorable Percy Anderson dismissed the complaint for lack of subject matter jurisdiction, and on August 3, 2020, Plaintiff filed the FAC against Defendants. *See* FAC. On December 18 and 28, 2020, Judge Anderson dismissed the claims against all defendants other than Brandyourself.com, Inc., Tom Vitolo, and Christian Tyron for lack of personal jurisdiction or failure to timely complete service. ECF Nos. 62 at 12, 66. On January 13,

2020, Brandyourself.com, Inc., Tom Vitolo, and Christian Tyron (the "Remaining Defendants") moved to dismiss the first amended complaint (the "FAC"). *See* Defs. Mot., ECF No. 63; FAC, ECF No. 9. For the reasons stated below, the Remaining Defendants' motion to dismiss is GRANTED.

BACKGROUND[2]

Beginning in late 2016, a series of allegedly defamatory comments about Plaintiff were posted on the website www.cheaterreport.com (the "Website"), along with photographs taken from Plaintiff's personal website, dating profiles, and social media platforms. FAC ¶ 24. These posts "consumed" all other search engine results for Plaintiff's name, which "severely harm[ed] his reputation and end[ed] his ability to earn money." *Id.* ¶ 25. The comments on the Website ultimately led to Plaintiff's being arrested twice, once in 2017 and once in 2018, and Plaintiff's filing of two false arrest lawsuits, which were subsequently settled. *Id.* ¶ 32.

From 2017 to 2019, Defendants and others "solicited and received" thousands of dollars from Plaintiff to "remove online libel and rehabilitate [his] online reputation." *Id.* ¶¶ 28, 31, 59–60. Plaintiff alleges that although Defendants and others represented to him that they had no connection to the Website, they were actually in cahoots with the Website, "work[ing] illegally with other individuals and business entities operating and maintaining [the Website]" and giving "kickbacks to the Website's operators. *Id.* ¶¶ 28–31, 68, 87–89.

2021, Judge Anderson ordered the action transferred to this district, but declined to rule on the pending motion to dismiss. ECF No. 75 at 6. The case was then assigned to the undersigned. 2/10/2021 Docket Entry.

[2] The following facts are taken from the FAC, which the Court accepts as true for purposes of this motion. *See Nielsen v. Rabin*, 746 F.3d 58, 62 (2d Cir. 2014).

DISCUSSION

I. Legal Standard

To survive a Rule 12(b)(6) motion to dismiss, a plaintiff must plead sufficient factual allegations in the complaint that, accepted as true, "state a claim to relief that is plausible on its face." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007)). A plaintiff is not required to provide "detailed factual allegations" in the complaint, but must assert "more than labels and conclusions[] and a formulaic recitation of the elements of a cause of action." *Twombly*, 550 U.S. at 555. Ultimately, the facts pleaded in the complaint "must be enough to raise a right to relief above the speculative level." *Id.* On a Rule 12(b)(6) motion, the court may consider only the complaint, documents attached to the complaint, matters of which a court can take judicial notice, or documents that the plaintiff knew about and relied upon. *See Chambers v. Time Warner, Inc.*, 282 F.3d 147, 153 (2d Cir. 2002). The court must accept the allegations in the complaint as true and draw all reasonable inferences in favor of the non-movant. *See ATSI Commc'ns, Inc. v. Shaar Fund, Ltd.*, 493 F.3d 87, 98 (2d Cir. 2007).

Moreover, *pro se* litigants are entitled to "special solicitude," and the Court shall construe a *pro se* "complaint to raise the strongest claims that it suggests." *Williams v. Priatno*, 829 F.3d 118, 122 (2d Cir. 2016) (quoting *Hill v. Curcione*, 657 F.3d 116, 122 (2d Cir. 2011)). Nonetheless, *pro se* status "does not exempt a party from compliance with relevant rules of procedural and substantive law." *Triestman v. Fed. Bureau of Prisons*, 470 F.3d 471, 477 (2d Cir. 2006) (quoting *Traguth v. Zuck*, 710 F.2d 90, 95 (2d Cir. 1983)).

II. Analysis

A. RICO Claims

RICO "sets forth four specific prohibitions aimed at different ways in which a pattern of racketeering activity may be used to infiltrate, control, or operate 'a[n] enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce.'" *RJR Nabisco, Inc. v. European Cmty.*, 136 S. Ct. 2090, 2097 (2016) (alteration in original) (quoting 18 U.S.C. § 1962). To plead a civil RICO claim under any of § 1962's subsections, a plaintiff must allege (1) conduct, (2) of an enterprise, (3) through either a pattern of racketeering activity or the collection of an unlawful debt. *See H.J., Inc. v. Nw. Bell Tel. Co.*, 492 U.S. 229, 232 (1989); *Lundy v. Catholic Health Sys. of Long Island, Inc.*, 711 F.3d 106, 119 (2d Cir. 2013) (citation omitted); *see also RJR Nabisco*, 136 S. Ct. at 2105.

RICO defines "racketeering activity" as the commission of certain criminal acts under state and federal law, including wire fraud under 18 U.S.C. § 1343 and extortion under 18 U.S.C. § 1951. 18 U.S.C. § 1961(1); *see also Liang v. Home Reno Concepts, LLC*, 803 F. App'x 444, 447 (2d Cir. 2020). Here, Plaintiff's RICO allegations are based on defamation, wire fraud, and extortion. *See* FAC ¶¶ 1, 44, 52, 67; Pl. Opp'n at 17, ECF No. 87.

Because "it is firmly established that defamation . . . do[es] not provide the requisite predicate for RICO violations," *Hollander v. Pressreader, Inc.*, No. 19 Civ. 2130, 2020 WL 2836189, at *4 (S.D.N.Y. May 30, 2020) (citation omitted), Plaintiff's allegations that Defendants published defamatory statements about him cannot serve as a predicate act for his RICO claim, FAC ¶¶ 52, 99.

Moreover, Plaintiff cannot support his RICO claim with predicate acts of wire fraud because he has not alleged wire fraud with sufficient particularity. The heightened pleading

requirements of Federal Rule of Civil Procedure 9(b) apply to RICO claims predicated on fraud. *See McLaughlin v. Anderson*, 962 F.2d 187, 191 (2d Cir. 1992). Therefore, Plaintiff must "specify the time, place, speaker, and content of the alleged misrepresentations, explain how the misrepresentations were fraudulent[,] and plead those events which give rise to a strong inference that [each] defendant[ ] had an intent to defraud, knowledge of the falsity, or a reckless disregard for the truth." *Jus Punjabi, LLC v. Get Punjabi US, Inc.*, 640 F. App'x 56, 58 (2d Cir. 2016) (quotation marks and citations omitted). "Where multiple defendants are asked to respond to allegations of fraud, the complaint should inform each defendant of the nature of his alleged participation in the fraud." *DiVittorio v. Equidyne Extractive Indus., Inc.*, 822 F.2d 1242, 1247 (2d Cir. 1987).

Plaintiff claims that Defendants and others (1) "intentionally flood[ed] the internet with misinformation that misdirects anyone reasonably searching for them to waste his or her time and resources and return to the state of despair that is, for those involved in this pattern of organized crimes, most profitable," FAC ¶ 34 (emphasis omitted); (2) intentionally misrepresented "on [their] website [and/or] to Plaintiff directly" that they "had nothing to do with," "strongly did not like," and "had no contact and or connections with" the Website "nor anyone and or any entity involved in operating and maintaining" the Website, *id.* ¶¶ 87–89; (3) "intentionally concealed from Plaintiff that they would work with and transact with individuals and entities responsible for operating and maintaining the [Website] . . . to induce Plaintiff to pay for 'removal services,'" *id.* ¶ 94; and (4) failed to uphold a promise to act in "good faith" and with "due diligence," *id.* ¶ 115.

These allegations do not "adequately specify the statements [Plaintiff] claims were false or misleading . . . [or] state when and where the statements were made." *McLaughlin*, 962 F.2d

at 191. Plaintiff also does not identify the particular statements each Defendant made. *Cf. McGee v. State Farm Mut. Auto. Ins. Co.*, No. 08 Civ. 392, 2009 WL 2132439, at *5 (E.D.N.Y. July 10, 2009). Even Plaintiff's most specific allegation, that Defendants communicated with Plaintiff "via multiple email, texts, and telephone" from February 2017 until August 2019, and "continued to intentionally misrepresent to Plaintiff that they had no connection with, much less did not support nor transact with those who host, operate and or maintain [the Website]," FAC ¶ 99, does not specify the fraudulent statements, which Defendant made the statement, or how each statement was made, *see Jus Punjabi*, 640 F. App'x at 58. Therefore, Plaintiff has failed to properly allege wire fraud as a predicate act. *See First Cap. Asset Mgmt., Inc. v. Satinwood, Inc.*, 385 F.3d 159, 179 (2d Cir. 2004); *see also Cont. Transp. Servs., Inc. v. New Era Lending LLC*, No. 17 Civ. 8224, 2018 WL 11226077, at *3 (S.D.N.Y. Oct. 26, 2018).

Finally, Plaintiff has not sufficiently alleged extortion. To demonstrate that Defendants engaged in extortion, Plaintiff must allege that Defendants "obstruct[ed], delay[ed], or affect[ed] commerce or the movement of any article or commodity in commerce, by . . . extortion or attempt[ed] or conspire[d] so to do, or commit[ted] or threaten[ed] physical violence to any person or property in furtherance of a plan or purpose to do [so]." 18 U.S.C. § 1951; *see also McLaughlin*, 962 F.2d at 194. Extortion is defined as the "obtaining of property from another, with his consent, induced by wrongful use of actual or threatened force, violence, or fear, or under color of official right." 18 U.S.C. § 1951(b)(2); *Entretelas Americanas S.A. v. Soler*, No. 19 Civ. 3658, 2020 WL 9815186, at *10 (S.D.N.Y. Feb. 3, 2020), *aff'd*, 840 F. App'x 601 (2d Cir. 2020), *as amended* (Jan. 7, 2021) (citation omitted). "[F]atal" to an extortion claim is "[t]he absence of allegations of force, violence or fear." *Entretelas Americanas*, 2020 WL 9815186, at

*10 (collecting cases).

Here, Plaintiff does not allege any force or violence. Instead, he appears to allege that Defendants used fear, stating that "the 'removal business' enterprise component of the [alleged scheme] receives payments for removals of said lethal defamations." FAC ¶¶ 28, 68. To the extent that Plaintiff is referring to a fear of reputational harm from allegedly defamatory statements, such a fear is insufficient to state an extortion claim under RICO. *Conte v. Newsday, Inc*., 703 F. Supp. 2d 126, 137 (E.D.N.Y. 2010). But, Plaintiff's claims, when construed liberally, could be seen as an attempt to allege that victims of Defendants fear the economic loss that would result from the defamatory statements. A fear of economic loss can sustain a claim for extortion if the fear is that "nonpayment would result in preclusion from or diminished opportunity for some existing or potential economic benefit." *DeFalco v. Bernas*, 244 F.3d 286, 313 (2d Cir. 2001) (citation omitted). The absence or presence of fear of economic loss "must be considered from the perspective of the victim, not the extortionist," and the plaintiff must show "that the victim reasonably believed: first, that the defendant had the power to harm the victim, and second, that the defendant would exploit that power to the victim's detriment." *Id.* (citation omitted).

Plaintiff has not sufficiently alleged an economic fear. Plaintiff does not claim that Defendants prevented him from going to other brand management firms to remove the defamatory statements, or that Plaintiff feared looking elsewhere because he believed Defendants would harm him. *See United States v. Capo*, 817 F.2d 947, 953 (2d Cir. 1987) (holding that fear of economic loss was not established where the victims were free to achieve their goals through other channels); *see also* FAC ¶ 106 (acknowledging the existence of brand management firms not involved in the alleged scheme). In fact, Plaintiff claims that he was not aware that

Defendants had any connection to the Website when he contracted with them, FAC ¶ 28, and, therefore, he could not have reasonably believed that Defendants would harm him if he did not hire them, *see Capo*, 817 F.2d at 951. Although Plaintiff argues in his opposition brief that "[D]efendants wrongfully communicated to [P]laintiff that if he did not pay them for their 'online reputation services', his life, work and ability to earn money would be forever decimated by the anonymous defamation and ever-present threat of [the Website], thus instilling fear of harm if [P]laintiff did not pay their fee and hire him," Pl. Opp'n at 19, no such threat is alleged in the FAC. Therefore, Plaintiff has not sufficiently alleged extortion.

Because Plaintiff has failed to allege any predicate acts, he has failed to state a RICO claim as well as a claim for RICO conspiracy. *See Entretelas Americanas S.A.*, 2020 WL 9815186, at *7; *First Cap. Asset Mgmt.*, 385 F.3d at 182. Accordingly, the Remaining Defendants' motion to dismiss Plaintiff's RICO claims is GRANTED.

B. State Law Claims

Plaintiff also brings state law claims for fraudulent misrepresentation, violation of the UCL, violation of California's right of publicity, and civil conspiracy. *See* FAC.

First, because Plaintiff's claim for fraud is predicated on the same allegations discussed above, Plaintiff fails to state a claim for fraud under the heightened pleading standards of Rule 9(b). FAC ¶¶ 86–97; *see also Adelphia Recovery Tr. v. Bank of Am., N.A.*, 624 F. Supp. 2d 292, 319 (S.D.N.Y. 2009).

Next, Plaintiff's claims for a violation of the UCL, which prohibits "any unlawful, unfair or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising," Cal. Bus. & Prof. Code § 17200, also fail. Plaintiff alleges a UCL violation based on the conduct underlying Remaining Defendants' alleged RICO violations, as well as wiretapping, criminal

eavesdropping, and trespass in order to eavesdrop. FAC ¶ 110. As discussed above, Plaintiff has not sufficiently alleged any predicate acts for a RICO violation, and the FAC contains no allegations that would support a claim based on wiretapping or eavesdropping by Defendants. Therefore, Plaintiff has not sufficiently alleged that Defendants engaged in unlawful conduct. And, because Plaintiff has not pleaded fraud with particularity and his allegations under the "unfair" prong sound in fraud, he also fails to allege that Defendants engaged in either unfair or fraudulent conduct. FAC ¶ 111; *see also Silver v. Stripe Inc.*, No. 20 Civ. 8196, 2021 WL 3191752, at *7 (N.D. Cal. July 28, 2021); *Harris v. LSP Prod. Grp., Inc.*, No. 18 Civ. 2973, 2021 WL 2682045, at *13 n.6 (E.D. Cal. June 30, 2021).

Plaintiff's claim for violation of the California right of publicity, based on the use of his name and image on posts on the Website fails as well. FAC ¶¶ 121–127. Claims based on the common law or statutory right of publicity require the plaintiff to show that the *defendant* "appropriated the plaintiff's name or likeness for commercial purposes." *Cross v. Facebook, Inc.*, 222 Cal. Rptr. 3d 250, 266–67 (Cal. App. Div. 2017) (quoting *Perfect 10, Inc. v. Google, Inc.*, No. 04 Civ. 9484, 2010 WL 9479060, at *13 (C.D. Cal. July 30, 2010), *aff'd*, 653 F.3d 976 (9th Cir. 2011)). Therefore, Defendants would be liable only insofar as they personally posted about Plaintiff, and Plaintiff makes no non-conclusory allegations that Defendants did so. *See* FAC ¶ 52 (alleging generally, without factual support or specifying which Defendants acted, that Defendants "aggressively publish[ed] defamatory and knowingly false statements about him"); Pl. Opp'n at 26 (suggesting that Defendants are aware of the "anonymous" posters of the defamatory material, an allegation which does not appear in the FAC).

Finally, Plaintiff's civil conspiracy claim also fails. Under both New York and California law, civil conspiracy is not an independent tort; it requires a separate tortious act. *See Doe v.*

Merck & Co., 803 F. App'x 559, 561 (2d Cir.); *Applied Equip. Corp. v. Litton Saudi Arabia Ltd.*, 869 P.2d 454, 459 (Cal. 1994). As Plaintiff has not sufficiently stated any tortious acts, his conspiracy claim fails as well.[3]

Moreover, even if Plaintiff had sufficiently pleaded an underlying tort, he does not sufficiently allege an agreement, which is a necessary component of a conspiracy claim. *See R.B. Dev., Co. v. Tutis Cap. LLC*, No. 12 Civ. 1460, 2018 WL 7076023, at *10 (E.D.N.Y. Nov. 14, 2018). Plaintiff makes no non-conclusory allegations that Defendants had a meeting of the minds with each other or with the rest of those involved in the alleged scheme. *See, e.g.*, FAC ¶¶ 76–85, 98–108; *see also Oceanside Organics v. Cty. of San Diego*, No. 15 Civ. 854, 2018 WL 1156431, at *5 (S.D. Cal. Mar. 5, 2018); *Kesner v. Dow Jones & Co., Inc.*, No. 20 Civ. 3454, 2021 WL 256949, at *28 (S.D.N.Y. Jan. 26, 2021).

Accordingly, the Remaining Defendants' motion to dismiss Plaintiff's state law claims is GRANTED.

C. Leave to Amend

Plaintiff, in the event the Court dismisses his claims, moves for leave to file a second amended complaint. Pl. Opp'n at 27–28. Rule 15(a)(2) of the Federal Rules of Civil Procedure provides that courts "should freely give leave" to amend a complaint "when justice so requires." Fed. R. Civ. P. 15(a)(2). *Pro se* litigants "should be afforded every reasonable opportunity to demonstrate that [they have] a valid claim." *Matima v. Celli*, 228 F.3d 68, 81 (2d Cir. 2000) (citation omitted). Under this liberal standard, a motion for leave to amend should be denied only if the moving party has unduly delayed or acted in bad faith, the opposing party will be unfairly prejudiced if leave is granted, or the proposed amendment is futile. *See Foman v. Davis*,

[3] Although Plaintiff originally brought a claim for defamation, ECF No. 1, he retracted that claim in the FAC.

371 U.S. 178, 182 (1962); *McCarthy v. Dun & Bradstreet Corp.*, 482 F.3d 184, 200 (2d Cir. 2007).

Plaintiff argues in support of his request that "clear facts establishing a pattern of anonymous defamation and extortion" by Defendants and others can be alleged. Pl. Opp'n at 27. The Remaining Defendants contend that Plaintiff has now had several opportunities to plead his claims and cannot do so, and that there is "a strong aroma of bad faith" in Plaintiff's claims, which are "made without factual support." Def. Reply at 8, ECF No. 88.

Although the Court does not find that Plaintiff acted in bad faith, *see Fontoine v. Permanent Mission of Chile to United Nations*, No. 17 Civ. 10086, 2019 WL 2482374, at *6 (S.D.N.Y. June 14, 2019) (explaining that courts "consistently reject" "conclusory allegation[s] of bad faith" (citation omitted)); *see also Cmty. Ass'n Underwriters of Am., Inc. v. Main Line Fire Prot. Corp.*, No. 18 Civ. 4273, 2020 WL 5089444, at *3 (S.D.N.Y. Aug. 28, 2020), the Court shall not grant Plaintiff leave to amend at this time because it cannot evaluate whether such an amendment would be futile, *see Horoshko v. Citibank, N.A.*, 373 F.3d 248, 249 (2d Cir. 2004); *see also* ECF No. 96. Plaintiff has neither provided a proposed second amended complaint, nor set forth the facts he would include in the second amended complaint.

Accordingly, Plaintiff's request to amend the FAC is DENIED without prejudice to renewal.

CONCLUSION

For the reasons stated above, the Remaining Defendants' motion to dismiss is GRANTED. Plaintiff's motion for leave to amend is DENIED without prejudice to renewal. By **July 6, 2022**, Plaintiff may move to file a second amended complaint, with an exhibit containing the proposed second amended complaint.

SO ORDERED.

Dated: June 3, 2022
New York, New York

ANALISA TORRES
United States District Judge

EXHIBIT 11

COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

AARON M. MINC, ESQ. 200 Park Avenue, Suite 200 Orange Village, Ohio 44122 and MINC LLC 200 Park Avenue, Suite 200 Orange Village, Ohio 44122 *Plaintiffs,* v. STEWART LUCAS MURREY 1217 Wilshire Blvd. #3655 Santa Monica, CA 90403 *Defendant.*	)	CASE NO. JUDGE: **COMPLAINT FOR ABUSE OF PROCESS, BREACH OF CONTRACT, & MISAPPROPRIATION OF TRADE SECRETS** **JURY TRIAL REQUESTED**

For his Complaint against Defendant Stewart Lucas Murrey ("Defendant"), Plaintiffs Aaron M. Minc ("Aaron Minc") and Minc LLC ("Minc Law") (collectively, "Plaintiffs") allege as follows:

PARTIES, JURISDICTION, & VENUE

1. Plaintiff Aaron Minc is an attorney licensed to practice law in Ohio and owns and operates Minc Law at the above captioned address.

2. Plaintiff Minc LLC d/b/a Minc Law is an Ohio law firm comprised of attorneys that focus primarily on the field of internet defamation. Minc Law is located at the above captioned address.

3. Defendant is a former client of Minc Law and resides in California at the above captioned address.

Electronically Filed 09/19/2020 13:08 / SERVICE / 20200919130810 / Confirmation 20758605 / 2097828 / CLNB1

121120607

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

FILED

AARON M. MINC AND MINC LLC, ET AL
Plaintiff

STEWART LUCAS MURREY
Defendant

Case No: CV-20-937433 2022 FEB 11 A 9:24

Judge: DEBORAH M TURNER

CLERK OF COURTS
CUYAHOGA COUNTY

JOURNAL ENTRY

96 DISP.OTHER - FINAL

MOTION FILED FOR D1 STEWART LUCAS MURREY PRO SE 9999999 DR. MURREY'S MOTION FOR SUMMARY JUDGMENT VERSUS AARON MINC AND MINC LAW (1 OF 6), FILED 12/18/2021, IS GRANTED.
MOTION FOR SUMMARY JUDGMENT FILED PLAINTIFFS' COMBINED MOTION FOR SUMMARY JUDGMENT PURSUANT TO CIV. R. 56 AND MOTION FOR SANCTIONS PURSUANT TO CIV. R. 11, FILED 12/17/2021, IS GRANTED AND DENIED IN PART.
MOTION FOR SUMMARY JUDGMENT FILED DR. MURREY'S MOTION FOR SUMMARY JUDGMENT AGAINST AARON MINC AND MINC LAW, FILED 12/17/2021, IS GRANTED.
ORDER SEE JOURNAL.
COURT COST ASSESSED AS EACH THEIR OWN.
PURSUANT TO CIV.R. 58(B), THE CLERK OF COURTS IS DIRECTED TO SERVE THIS JUDGMENT IN A MANNER PRESCRIBED BY CIV.R. 5(B). THE CLERK MUST INDICATE ON THE DOCKET THE NAMES AND ADDRESSES OF ALL PARTIES, THE METHOD OF SERVICE, AND THE COSTS ASSOCIATED WITH THIS SERVICE.

OSJ

Judge Signature Date

At the heart of all of Murrey's claims is that in some unknown manner Minc has conspired with Cheaterreport.com, Rivera, IRC, and dozens of other persons and entities. He has not provided any evidence to support this assertion.

B. Vexations Litigator

Plaintiff has demonstrated that Murrey has filed other lawsuits. Some of these lawsuits were settled, some are still pending. Some parties, such as Minc, were dismissed on jurisdictional grounds and not on the merits. Plaintiffs have failed to prove any of them were baseless. This is the only lawsuit filed in Ohio. Plaintiffs have not demonstrated that Murrey is a vexatious litigator.

C. Rule 11 Sanctions

Plaintiffs have failed to demonstrate that Rule 11 sanctions are warranted.

V. CONCLUSION

For the forgoing reasons Plaintiff Minc's Motion for Summary Judgment is GRANTED. Defendant Murrey's Motion for Summary Judgment is GRANTED.

All claims of all parties are dismissed. This is a final appealable order. There is no just reason for delay.

IT IS SO ORDERED.

Deborah M. Turner
JUDGE DEBORAH M. TURNER

2/10/2022
DATE

EXHIBIT 12

agreement with Minc Law (which he clearly wasn't), this has no effect on the validity or alleged breach of the forum selection clause, which has already been ruled to be valid and not the product of fraud. *Id.* Accordingly, Murrey should be precluded from asserting this defense again at trial under the doctrine of collateral estoppel.

c. Murrey Misappropriated Trade Secrets from Plaintiffs and has Improperly Used them in his Abusive Lawsuits Against Plaintiffs and Others

Under Ohio's Uniform Trade Secrets Act, parties may seek damages and injunctive relief for the misappropriation of trade secrets. O.R.C. 1333.62. To prevail on a misappropriation-of-trade secret claim, Plaintiffs "must show by a preponderance of the evidence: (1) the existence of a trade secret; (2) the acquisition of a trade secret as a result of a confidential relationship; and (3) the unauthorized use of a trade secret." *Tomaydo-Tomahhdo L.L.C v. Vozary*, 2017-Ohio-4292, *9 (8th Dist. App.), citing *Heartland Home Fin., Inc. v. Allied Home Mtge. Capital Corp.*, 258 Fed. Appx 860, 861 (6th Cir. 2008).

The term, "misappropriate" means: "(1) Acquisition of a trade secret of another by a person who knows or has reason to know that the trade secret was acquired by improper means." § 1333.61(B)(1). The term "improper means" is defined as including "theft, bribery, misrepresentation, breach or inducement of a breach of a duty to maintain secrecy, or espionage through electronic or other means." *Id.* at (A).

A "trade secret" includes, "any business information," including "names" and contact information that is economically valuable, not generally know or accessible to other people, and subject to reasonably effort to maintain its secrecy. R.C. 1333.61(D); *Tomaydo-Tomahhdo, LLC v. Vozary,* 2015 U.S. Dist. LEXIS 10532 (N.D. Ohio, 2015); *MP TotalCare Services, Inc. v. Mattimoe*, 648 F. Supp. 2d 956 (N.D. Ohio 2009). For example, customer names are presumptively considered trade secrets when a business owner takes measure to prevent its

Electronically Filed 01/14/2022 11:32 / BRIEF / CV 20 937433 / Confirmation Nbr. 2449415 / BATCH

disclosure in the ordinary court of business to persons other than those selected by the owner. *State ex rel. Lucas Cty. Bd. of Commrs. v. Ohio Environmental Protection Agency*, 88 Ohio St. 3d 166, 2000-Ohio-282, 724 N.E.2d 411 (2000)

As to the first requirement for a claim, Plaintiffs have alleged facts that of a trade secret exists that was improperly misappropriated by Murrey. *See* Exhibit 7, Attached, ¶3; Minc's MSJ, Exhibit 7, ¶9-18.

As to the second requirements, Ohio's misappropriation of trade secrets statute does not require a specific contractual promise on the part of defendant not to use or divulge confidential information in order to state a claim. *Kuvedina, LLC v. Cognizant Technology Solutions*, 946 F. Supp. 2d 749, 756 (S.D. Ohio 2013); *Power Marketing Direct, Inc.*, 2004 U.S. Dist. LEXIS 29068, at *7 (S.D. Ohio 2004). The statute merely requires that the information be "acquired under circumstances giving rise to a duty to maintain its secrecy or limit its use[.]" Section 1333.61(B)(2)(b). "The fact that [a] defendant did not specifically agree not to disclose trade secrets is not important." *Power Mktg. Direct, Inc.*., at *19.

Here, the acquisition of the information by Murrey was the result of a confidential relationship and disclosure. Murrey was a client of Minc Law seeking information from the firm related to his legal matter and more. Minc's MSJ, Exhibit 7, ¶9-18. Mr. Minc was providing Murrey legal counsel and advice. *Id.* Murrey used improper means to obtain the information in question by lying to Mr. Minc about his intended use for the information. *Id.* Murrey was informed the information he was receiving was of a confidential and sensitive nature. For example, Murrey was informed by Mr. Minc that Mr. Rivera had been targeted with harassment and death threats. Clearly, his contact information was not meant to be distributed publicly or filed in a lawsuit. The second prong of this claim is satisfied.

Electronically Filed 01/14/2022 11:32 / BRIEF / CV 20 937433 / Confirmation Nbr. 2449415 / BATCH

EXHIBIT 13

2021-1437. Murrey v. Turner.
In Mandamus. On respondent's motion to dismiss. Motion granted. Cause dismissed.

O'Connor, C.J., and Kennedy, Fischer, DeWine, Donnelly, Stewart, and Brunner, JJ., concur.

The Supreme Court of Ohio

CASE ANNOUNCEMENTS

February 23, 2022

[Cite as *02/23/2022 Case Announcements*, 2022-Ohio-461.]

MERIT DECISIONS WITH OPINIONS

2020-0031. Siltstone Resources, L.L.C. v. Ohio Pub. Works Comm., Slip Opinion No. 2022-Ohio-483.
Belmont App. No. 18 BE 0042, 2019-Ohio-4916. Judgment affirmed.

O'Connor, C.J., and Stewart and Brunner, JJ., concur.

Donnelly, J., concurs, with an opinion.

DeWine, J., dissents, with an opinion joined by Kennedy and Fischer, JJ.

2021-0911. Davis v. Hill, Slip Opinion No. 2022-Ohio-485.
Marion App. No. 9-21-06. Judgment affirmed.

O'Connor, C.J., and Kennedy, Fischer, DeWine, Donnelly, Stewart, and Brunner, JJ., concur.

2021-0973. Medina Cty. Bar Assn. v. Schriver, Slip Opinion No. 2022-Ohio-486.
On Certified Report by the Board of Professional Conduct, No. 2020-079. Respondent, Andrew Charles Schriver, Attorney Registration No. 0096887, last known business address in Cleveland, Ohio, publicly reprimanded.

Kennedy, DeWine, Donnelly, and Brunner, JJ., concur.

O'Connor, C.J., and Fischer and Stewart, JJ., concur in the finding of a violation but dissent in part on the sanction and would suspend respondent for six months, all stayed, and would require a monitoring attorney for one year to ensure respondent's continuing compliance with his Ohio Lawyers' Assistance Program obligations, which he had fallen out of compliance with for a period of time, as noted in the opinion.

EXHIBIT 14

Lee Jenney July 12, 2020 at 3:33 AM

Re: HAG BASTARD

To: Lucas Murrey, 256

You son of a bitch, you're an increasing danger, providing your loser fuckhead women with my personal info. An ever increasing defamation situation. BASTARD.

Sent from my iPhone

See More from Lee Jenney

Juno Reilly <junoreilly@yahoo.com>

to me

Sat, May 18, 1:33 PM

You piece of garbage. I'm sending you a demand letter by certified mail. You treat any stranger better. You're utter garbage. I'm serious about this. I want my money back so I don't feel degraded.

Sent from my iPhone

Lee Jenney <jenneydfw@yahoo com>

to me ▾

Sun, May 19, 1:12 PM

YOU DO, YOU FUCKING ASSHOLE. MOST YOUR TYPE OF GIRLFRIENDS LOOK LIKE THEY HAVE NOTHING BEHIND THEIR EYES BUT SPACE. YOU LIKE THE CRAZY LOONEY LOOK AND MANY HAVE THE LARGEST HOOK NOSES IN THIS LAND. YOU LIKE UGLY. YOU STARE AT LIZARDLIKE OLD WOMEN AND FAT GRANNIES. YOU LOOK SKETCHY WITH YOU BEARD AND WHEN YOU SHAVE IT, YOU LOOK LIKE A WIMPY FAG WITH UGLY LIPS. CONCENTRATE ON YOUR FACE WITH YOUR FOREHEAD AS THE FOCAL POINT. YOU ARE DAMN UGLY. YOU ARE AN UNAPOLOGETIC UNGRATEFUL ENTITLED ASSHOLE AND I WILL SHOW YOU WHAT I WILL DO. I WILL FILE A LAWSUIT AND IF YOU WANT TO TURN IT UGLY, WE CAN. I HAVE SO MUCH ON YOU. I HAVE MULTIPLE RECORDINGS OF YOU SAYING THE N WORD. I WANT YOU TO PAY ME AND GET OUT OF MY MIND. $400 OR LAWSUIT GETS FILED. LAWSUIT GETS FILED WITH A RESPECTABLE DAY IN COURT. IF YOU WANT TO TURN IT UGLY, LETS GO. I WILL SHOW YOUR FAGGOT ASS ALL I'M MADE OF.

...

[redacted] Sun, May 19, 1:22 PM

Lee Jenney July 24, 2020 at 12:17 PM

Re: Global Settlement Offer 1152 Confidential

To: Dr. Lucas Murrey

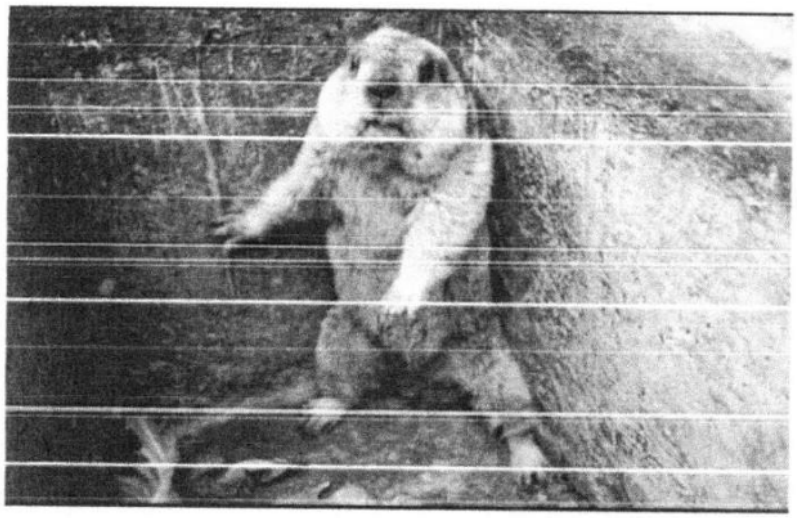
I'm going to the POLICE YOU FAGGOT.

Sent from my iPhone

> On Jul 24, 2020, at 9:27 AM, Dr. Lucas Murrey <2@lucasmurrey.io> wrote:
>
> Attached
>
> <GLBLSTTLMNTFFR.DrMurreyVLee.pdf>
>
> See More

Lee Jenney
Pest Control
To: [redacted]

This attached picture of you backed into a corner, running around making a mess, and hissing and screaming at me to let you out, illustrates your actions in setting hearings and continuing them. You have canceled an informal discovery conference that would have helped delineate to you the deficiencies in your form interrogatories and you have opted for a motion to compel further setting, apparently but not clearly since you never properly noticed the original motion to compel. I don't know what you're doing especially having the deficiencies clearly outlined to you but suspect you will continue this next hearing as well. This will be unacceptable during the holidays and I will not be available for any further hearings during the last two weeks of December thru the first two weeks of January.



Sent from my iPhone

Lee Jenney

Re: COME GET YOUR PILLS MURDERER

To: 256

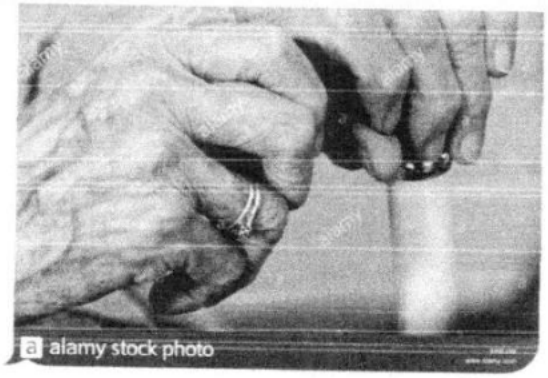
July 22, 2020 at 9:25 PM

CABEZE DE VACA. HEAD OF COW. IS YOUR FUCKING UGLY BITCHES

See More from Lee Jenney

5:47

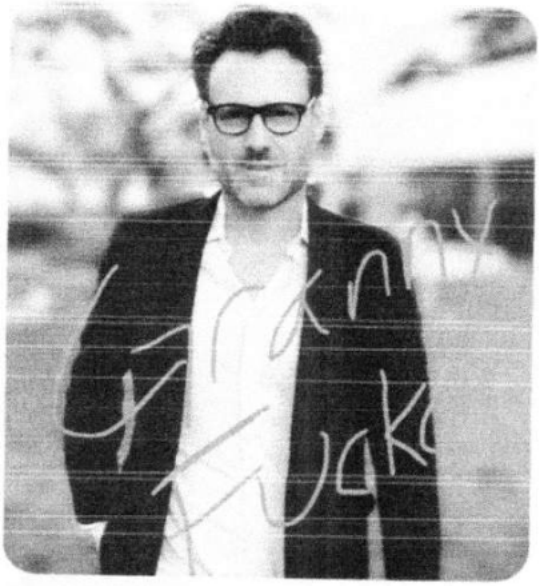
jenney lee (310) 905-4488



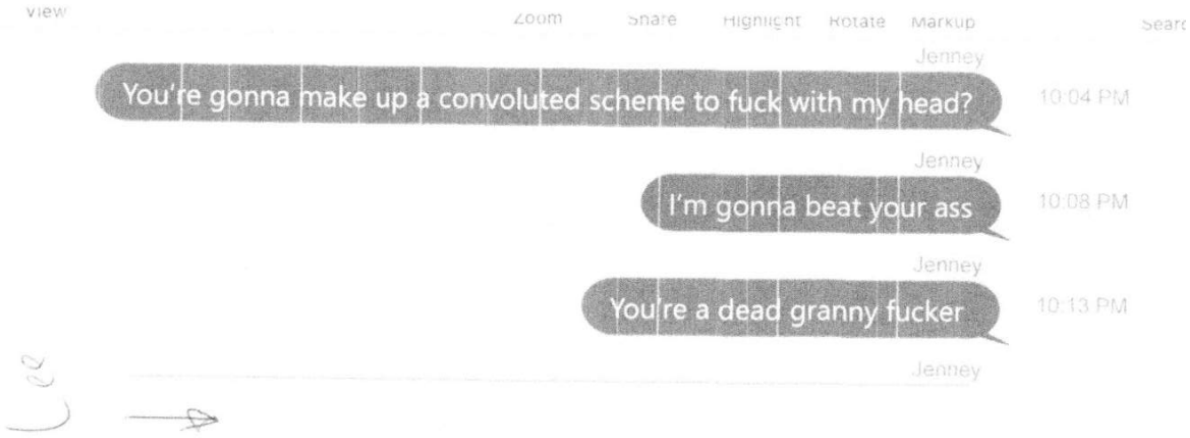
Get that Will together

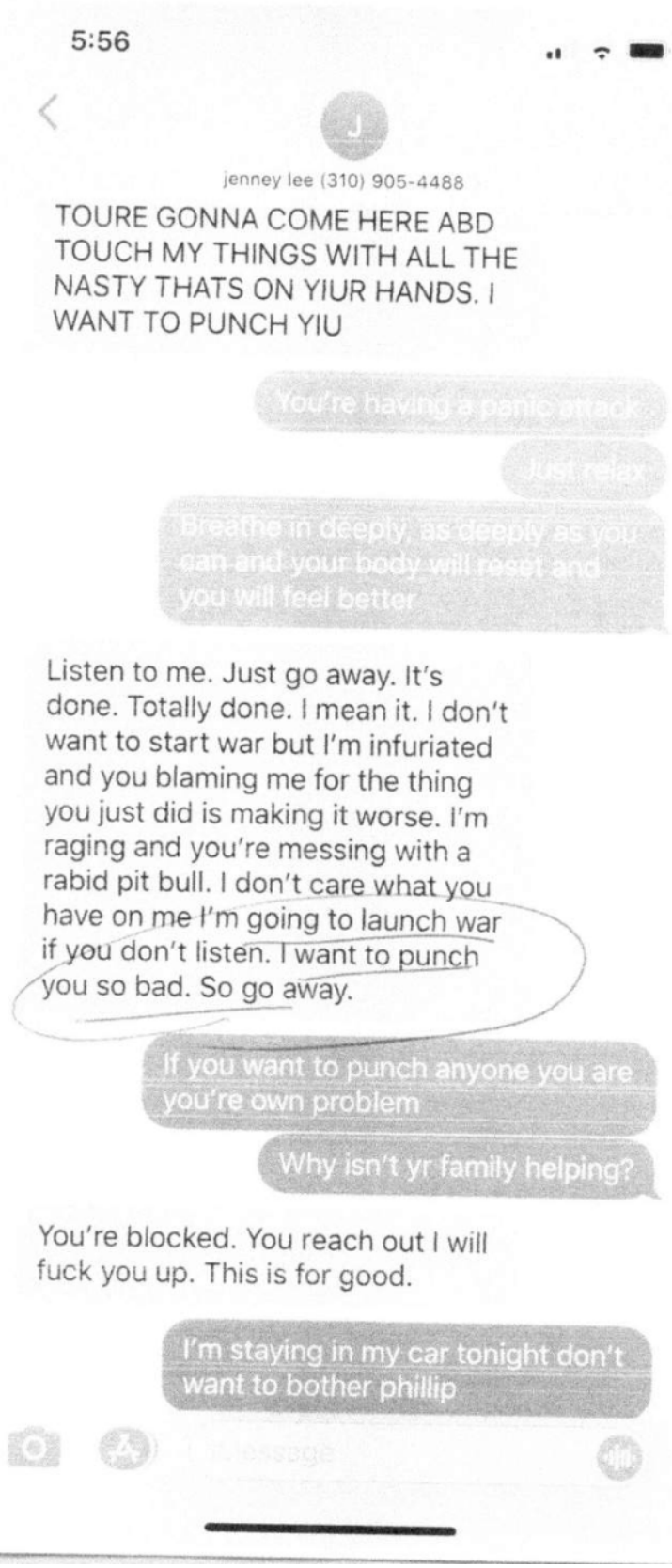
This one can't even qualify for life insurance

Such a Casanova



So sad


View
Zoom
Share
Highlight
Rotate
Markup
Jenney
You're gonna make up a convoluted scheme to fuck with my head?
10:04 PM
Jenney
I'm gonna beat your ass
10:08 PM
Jenney
You're a dead granny fucker
10:13 PM
Jenney


5:56
J
jenney lee (310) 905-4488
TOURE GONNA COME HERE ABD TOUCH MY THINGS WITH ALL THE NASTY THATS ON YIUR HANDS. I WANT TO PUNCH YIU
You're having a panic attack
Just relax
Breathe in deeply as deeply as you can and your body will reset and you will feel better
Listen to me. Just go away. It's done. Totally done. I mean it. I don't want to start war but I'm infuriated and you blaming me for the thing you just did is making it worse. I'm raging and you're messing with a rabid pit bull. I don't care what you have on me I'm going to launch war if you don't listen. I want to punch you so bad. So go away.
If you want to punch anyone you are you're own problem
Why isn't yr family helping?
You're blocked. You reach out I will fuck you up. This is for good.
I'm staying in my car tonight don't want to bother phillip

9:29 LTE

yenni

I'm enjoying your test dtla very subtle

Are you ok? Don't drink so much you've got so many vital things to do

Yeah trouble shooting things and I'm stressed. But I'm taking it a lot easier this year and enjoying life more. How r u?

Sorry you always seem to get me around my periods

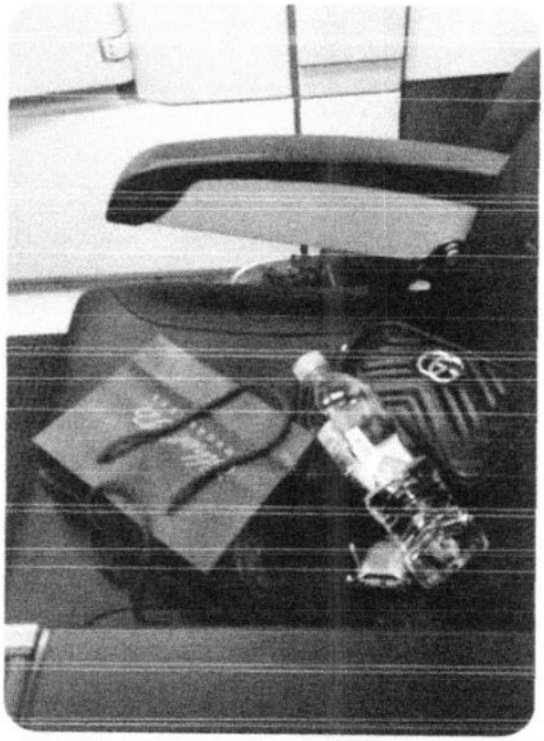
This attorney friend I forgot about.

I'm already drinking.

This has been an intense day.

Why not prove to yourself you don't have to drink?

Thu, May 2, 8:34 PM



Told gate lady I have food poisoning and 2 airline credit cards so she gives me my own exit row.

iMessage

11:42 5GE

jenney lee (310) 905-4488

Ex-Wife Wendi Deng Is Dating Vla.

She was married to Robert Murdoch owner of Fox. And now dating Putin. Need to learn from her.

I need to meet Putin.

11:03 5GE

jenney lee (310) 905-4488

DONALDATERS

MAKE AMERICA DATE AGAIN.

FOX NEWS

Donald Daters, new app for Trump supporters, aims to 'Make America Date Again'

Brittany Magoun

6 hrs

7 10 Comments

Write a comment...

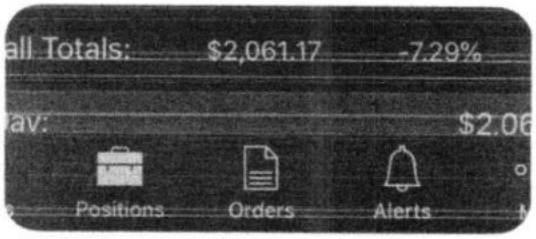
Fox News

yesterday at 11:30 PM

The new dating app launched Monday for Apple

Lol

Oct 16, 2018, 1:46 PM



Made two grand

Nice

iMessage

11:45 5GE

jenney lee (310) 905-4488

She's ratchet

Fat Jewish girl

$100 for full service. Herpes attached. Ratchet.

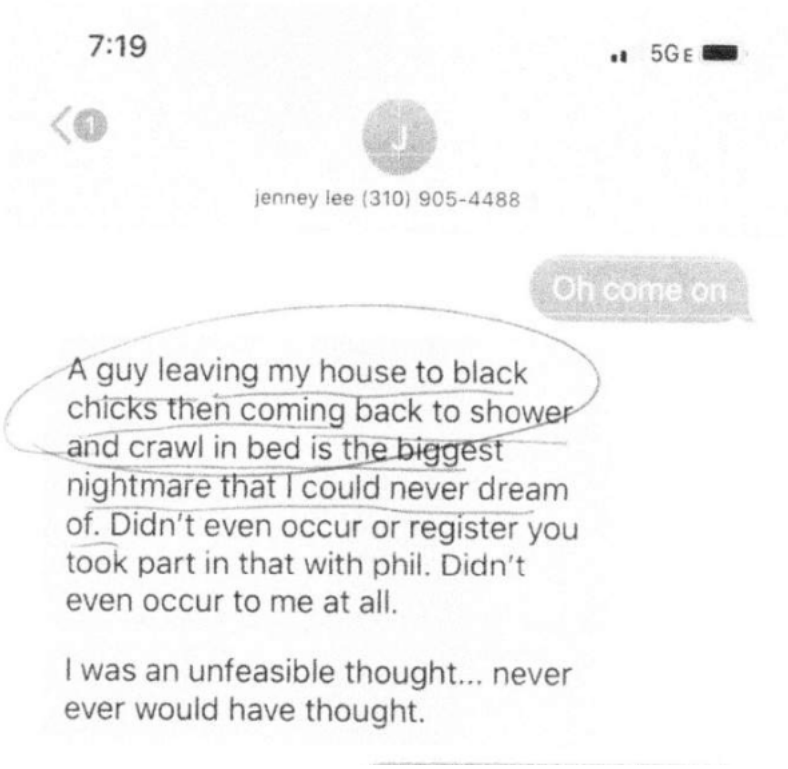
I'm like "Zach hook me up w your dad" I'm such an animal.

Animal summer of slay

I need more than "global warming" to procure my next 4 yrs for president

In a pivotal state we were. It's going back to global power. Everyone is rooting against us.

Tue, Apr 2, 12:46 AM


7:19
5G E
1
J
jenney lee (310) 905-4488
Oh come on
A guy leaving my house to black chicks then coming back to shower and crawl in bed is the biggest nightmare that I could never dream of. Didn't even occur or register you took part in that with phil. Didn't even occur to me at all.
I was an unfeasible thought... never ever would have thought.

11:11 5GE

jenney lee (310) 905-4488

Oct 23, 2018, 7:20 PM

Lea

disturbing news, this week, from the Centers or Disease Control and Prevention. The ederal agency reported that 48 percent of lack women between the ages of 14 and 49 ave herpes simplex virus type 2, or HSV 2 as 's called. Overall blacks and women were

ican Americans are by far the most affected ra ethnic group with a lifetime HIV risk of 1 in 20 n (compared to 1 in 132 for whites) and 1 in 48 men (compared to 1 in 880 for whites).

1 out of 2 black women have herpes simplex virus 2. 1 out of 48 black women have hiv.

Hope it's worth it

Whatever you're desperare mind is getting out of it

Telling Richard. Nobody agrees w u

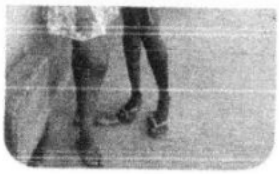
Might as well give up your vegetarian diet

11:12

5GE

jenney lee (310) 905-4488

Lee



7:19 5G E

1

J

jenney lee (310) 905-4488

We won

I feel like my son just told me he's gay.

This woman has a better body. No baby scars

Go to a nursing home to pick up more

Yr model of beauty is as advanced as a racist on people

Her face looks like a scull. She looks elderly. Would imagine it would be bland mature porn. It's taboo and not normal.

EXHIBIT 15

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

West District, Santa Monica Courthouse, Department S

19SMSC01862 November 19, 2019
JENNEY LEE vs STEWART LUCAS MURREY 11:29 AM

Judge: Honorable Lisa K Sepe-Wiesenfeld
Judicial Assistant: Robin Olson
Courtroom Assistant: None

CSR: None
ERM: None
Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): No Appearances

For Defendant(s): No Appearances

NATURE OF PROCEEDINGS: Ruling on Submitted Matter: Small Claims Trial

The Court, having taken the matter under submission November 14, 2019, now rules as follows.

Upon review of the evidence and testimony, the court finds that plaintiff has not met her burden of proof.

Court orders judgment entered on the Amended Plaintiff's Claim (1st) filed by Jane Doe on 10/28/2019 as follows: Defendant Stewart Lucas Murrey does not owe the plaintiff Jane Doe any money on plaintiff's claim.

Certificate of Mailing is attached.

WEST DISTRICT
Santa Monica Courthouse
1725 Main Street
Santa Monica CA 90401

SMALL CLAIMS CASE NO: 19SMSC01862

- NOTICE TO ALL PLAINTIFFS AND DEFENDANTS –

Your small claims case has been decided. If you lost the case, and the court ordered you to pay money, your wages, money, and property may be taken without further warning from the court. Read the back of this sheet for important information about your rights.

***- AVISO A TODOS* LOS *DEMANDANTES Y DEMANDADOS* –**

Su caso ha sido resuelto por la corte para reclarnos judiciales menores. Si la corte ha decidido en su contra y ha ordenado que usted pague dinero, le pueden quitar su salario, su dinero, y otras cosas de su propiedad, sin aviso adicional por parte de esta corte. Lea el reverso de este formulario para obtener informacion de importancia acerca de sus derechos.

PLAINTIFF/DEMANDANTE
Jane Doe
1431 ocean avenue #201
santa monica, CA 90401

DEFENDANT/DEMANDADO
Stewart Lucas Murrey
1217 Wilshire Blvd #3655
santa monica, CA 90403

NOTICE OF ENTRY OF JUDGMENT

JUDGMENT WAS ENTERED AS STATED BELOW ON (DATE): 11/19/2019
Court orders judgment entered on the Amended Plaintiff's Claim (1st) filed by Jane Doe on 10/28/2019 as follows: Defendant Stewart Lucas Murrey does not owe the plaintiff Jane Doe any money on plaintiff's claim.

Enforcement of the judgment is automatically postponed for 30 days or, if an appeal is filed, until the appeal is decided.

CLERK'S CERTIFICATE OF MAILING - I certify that I am not a party to this action. This *Notice of Entry of Judgment* was mailed first class, postage prepaid, in a sealed envelope to the parties at the addresses shown above. The mailing and this certification occurred at the place and on the date shown below.

Place of mailing: Santa Monica CA 90401
Date of mailing: 11/19/2019

Sherri R. Carter, Executive Officer / Clerk of Court
Gloria Tapanes

Clerk by _____ **, Deputy**

- **The county provides small claims advisor services free of charge. Read the information sheet on the reverse.**

SC-105 Request for Court Order and Answer (Small Claims)

Clerk stamps date here when form is filed.

FILED
Superior Court of California
County of Los Angeles
JUL 17 2020
Sherri R. Carter, Executive Officer/Clerk
By _____, Deputy
Charlene Vital

Request

This form is used to ask the court to make an order before or after the trial in asmall claims case. The court will notify all plaintiffs and defendants in thiscase about its decision by mail, at the trial, or at a hearing (depending on when the request is filed).

If you are the person asking the court to make an order, ask the Small Claims Advisor if this is the right form for the kind of order you want. If so, follow these steps:

Fill out page 1 of this form and file it at the clerk's office.

If you are making this request ***before*** your trial, you must mail (or deliver in person) a copy of this form to all other plaintiffs and defendants in your case. *Exception:* If the plaintiff's claim has not been served, you do not have to serve this request on the other plaintiffs and defendants in your case.

If you are making this request ***after*** the judge has decided your case, the clerk will mail a copy of this form to all other plaintiffs and defendants in your case. The court will give the other plaintiffs and defendants at least 10 days to answer this *Request.*

Fill in court name and street address:

Superior Court of California, County of
Los Angeles - Santa Monica - West District
Los Angeles Superior Court
Santa Monica Courthouse
1725 Main Street, Rm 224
Santa Monica, CA 90401

Fill in your case number and case name below:

Case Number:
19SMSC01862

Case Name:
JenneyLee v. Dr. StewartLucas Murrey

If you receive this form, read below, then fill out (7) – (10) on page 2.

(1) The person asking the court to make an order is:

Name: Dr. Stewart Lucas Murrey

Address: 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403

Check one: ☒ A defendant in this case ☐ A plaintiff in this case

☐ Other *(explain):* _____

(2) Notice to: *(List names and addresses of all other defendants and plaintiffs in your case.)*

	Name	Address
a.	Jenney Lee	1431 Ocean Ave, # 201, Santa Monica, CA 90401
b.		
c.		

☐ *Check here if you need more space. Use Form MC-031 or a plain sheet of paper. Write "SC-105, Item 2" on top.*

If your request is made before the trial and after the claim was served, fill out below:

I ☐ mailed ☐ delivered in person a copy of this form to everyone listed in (2) on *(date):* _____

(3) I ask the court to make the following order *(specify):*

Per the judge's own order given verbally during trial, but which the clerk perhaps forgot, plaintiff Jenney Lee's attempt to remain anonymous with the name "Jane Doe" in this case is unacceptable as the public has a righ to a public record -- especially, in my own opinion, when a person is harassing and harming people.

☒ *Check here if you need more space. Use Form MC-031 or a plain sheet of paper. Write "SC-105, Item 3" on top.*

(4) I ask for this order because *(explain and give facts of your case here):*

This is a technical matter and should have been done days after the hearing in 2019. And now as I will relate this case to my civil unlimited case against Ms. Lee who is now a defendant, I want the docket and public record to be clear. I am preparing for this to go to trial, if I am unable to accept a settlement.

☐ *Check here if you need more space. Use Form MC-031 or a plain sheet of paper. Write "SC-105, Item 4" on top.*

(5) In making its order, I ask the court to consider the information on this form, any records on file, and, if the court holds a hearing, the evidence presented at that hearing.

(6) I declare under penalty of perjury under California state law that the information above and on all attachments is true and correct.

Date: 15 July 2020

Dr. Stewart Lucas Murrey
Type or print your name

▶ _____
Sign your name

SC-105 **Request for Court Order and Answer (Small Claims)**

Clerk stamps date here when form is filed.

Answer

The person listed in (1) on page 1 of this form has asked the court to make an order in your small claims case.

Follow these steps to tell the court what you want to do about this request:

- Read page 1 to see what the person in (1) is asking for.
- Fill out (7)–(10) below.
- Mail your completed form to the court right away.
- Mail a copy of this form to each plaintiff and defendant listed in (1) and (2) on page 1 of this form.

The court will mail its decision to all plaintiffs and defendants in this case or will make a decision at a court hearing or trial.

If you do nothing, the court may make the order without hearing from you.

Fill in court name and street address:

Superior Court of California, County of
Los Angeles - Santa Monica - West
Los Angeles Superior Court
Santa Monica Courthouse
1725 Main Street, Rm 224

Fill in your case number and case name below:

Case Number:
19SMSC01862

Case Name:
Jenney Lee v. Stewart Lucas Murrey

(7) The person filing this answer is:

Name: Jane Doe

Address: 1431 Ocean Avenue #201, Santa Monica, CA 90401

Check one: ☐ A defendant in this case ☑ A plaintiff in this case

(8) Tell the court what you want to do about this request.

(Check all that apply):

a. ☐ I agree to the order requested in (3).

b. ☑ I do not agree to the order requested in (3). *(Explain below:)*

Jane Doe filed the original SC-100 correctly and Defendant does not need to suggest any alternatives over 6 months after the hearing. Jane Doe is the correct name and no further action is needed. Defendant Murrey is stalking Jane Doe after trying to kill her the same way that Sherrie Martinez died.

☑ *Check here if you need more space. Use Form MC-031 or a plain sheet of paper. Write "SC-105, Item 8" on top.*

c. ☑ I ask the court to have a hearing to decide this matter.

(9) I mailed a copy of this form to everyone listed in (1) and (2) of this form on *(date):* 7/27/2020

(10) I declare under penalty of perjury under California state law that the information above and on all attachments is true and correct.

Date: 7/27/2020

Jane Doe
Type or print your name

▶ _____
Sign your name

Need help?
For free help, contact your county's Small Claims Advisor:

Or, go to "County-Specific Court Information" at *www.courts.ca.gov/selfhelp/smallclaims*

If the request on page 1 was made after the hearing, the clerk fills out below.

—Clerk's Certificate of Mailing—

I certify that I am not involved in this case and *(check one):*

☐ A Certificate of Mailing is attached.

☐ The *Request for Court Order and Answer* was mailed first class, postage paid, to all parties at the addresses listed in (2).

On *(date):* _____

From *(city):* _____, California

Clerk, by _____, Deputy

For your protection and privacy, please press the Clear This Form button after you have printed the form. Print this form Save this form Clear this form

SC-105A Order on Request for Court Order (Small Claims)

Clerk stamps date here when form is filed.

FILED
Superior Court of California
County of Los Angeles
07/28/2020
Sherri R. Carter, Executive Officer / Clerk of Court
By: B. Bailey Deputy

(1) The court has received and considered *(check all that apply):*

- ☑ *Request for Court Order and Answer*, Form SC-105 (page 1) filed on: _____
- ☑ Answer on *Request for Court Order and Answer*, Form SC-105 (page 2) filed on: _____
- ☐ Other *(specify):*

_____

_____

Clerk fills in court name and street address:

Superior Court of California, County of
Los Angeles Superior Court
Santa Monica Courthouse
1725 Main Street, Rm 224
Santa Monica, CA 90401

(2) **The court makes the following orders:**

a. ☒ The request is granted.

b. ☐ The request is denied.

c. ☐ **You must go to court if you want to be heard.**
A hearing on this request is scheduled as follows:

Hearing Date → Date _____ Time _____ Dept. _____

Name and address of court if different from above

_____

_____

Clerk fills in case number and case name below:

Case Number:
19SMSC01862
Case Name:
Lee vs. Murrey

d. ☐ Bring evidence to the hearing to support your request.

e. ☒ Other orders *(specify):* Record should reflect that Jane Doe also identified herself in court as Jenney Lee

f. ☒ Explanation for decision *(if any):* Court file is corrected to reflect that Jane Doe is also known as Jenney Lee

Date: 7/28/20

▶ Lisa K. Lupe-Wiesinger
(Judge or Judicial Officer)

Need help?
For free help, contact your county's Small Claims Advisor:

Or, go to "County-Specific Court Information" at:
www.courtinfo.ca.gov/selfhelp/smallclaims

— Clerk's Certificate of Mailing —

I certify that I am not involved in this case and *(check one):*

- ☐ A Certificate of Mailing is attached.
- ☐ This *Order* was mailed first class, postage paid, to all parties at the addresses listed in (1) and (2) on the *Request for Court Order and Answer.*

On *(date):* 07/28/2020
From *(city):* Santa Monica, California
Sherri R. Carter, Executive Officer / Clerk of Court
Clerk, by B. Bailey, Deputy

Requests for Accommodations Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least 5 days before the hearing. Contact the clerk's office for *Request for Accommodations by Persons With Disabilities and Response (Form MC-410). Civil Code, § 54.8*

This is a Court Order.

For your protection and privacy, please press the Clear This Form button after you have printed the form.

Print this form | Save this form | Clear this form

EXHIBIT 16

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Stanley Mosk Dept. - 94

20STRO03633
Murrey, Stewart Lucas
vs
Lee, Jenney

August 7, 2020
1:30 PM

Honorable Laura Cohen, Commissioner

Amy Eubanks, Judicial Assistant
Frank Andrade, Court Services Assistant

Michelle Koh (#12509), Court Reporter

NATURE OF PROCEEDINGS: Petitioner's Request for Civil Harassment Restraining Order (filed on July 16, 2020)

The following parties are present for the aforementioned proceeding:

Jenney Lee, Respondent in pro per
Stewart Murrey, Petitioner in pro per

The matter is called for hearing.

It is stipulated by the parties that Commissioner Laura Cohen may hear this matter as Judge Pro Tem. Stipulation for the Appointment of Court Commissioner is signed and filed this date.

The parties are affirmed.

The Respondent agrees to communicate with Petitioner only via email and only regarding their ongoing civil litigation. In exchange, the Petitioner agrees to dismiss his Restraining Order request.

On the motion of Petitioner, the Request for Civil Harassment Restraining Order is dismissed without prejudice.

No temporary orders were issued in this case.

The Court makes its order in open court, with both parties personally present. Further notice of this proceeding is not required.

EXHIBIT 17

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Santa Monica Dept. - F

20STRO04689
Murrey, Stewart Lucas
vs
Lee, Jenney H

December 18, 2020
9:00 AM

Honorable Mark A Young, Judge

Kristie Metoyer, Judicial Assistant — Not Reported, Court Reporter

---

NATURE OF PROCEEDINGS: Petition - Civil Harassment filed by Petitioner on September 3, 2020

Matter is transferred from Department F to Department M, to be heard with cases 19SMCV01861 and 20SMRO00181.

The following parties are present for the aforementioned proceeding:

Jenney Lee, Respondent
Stewart Murrey, Petitioner

The matter is called for hearing.

The parties are placed under oath and testify.

The Court finds that the Petitioner has not met his burden of proof by a preponderance of the evidence.

Having found no basis for the issuance of a permanent restraining order, the Court hereby denies request. Any and all restraining orders are hereby dissolved.

The case is ordered dismissed.

It is ordered that the exhibits may be released to parties to be retained and maintained at their respective offices pending final determination of this action, including time for motions and appeal thereafter to be disposed of by them as they see fit, unless otherwise ordered by a court of competent jurisdiction.

Minutes entered by Wendy Carr from the notes of Kristie Metoyer.

EXHIBIT 18

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT M HON. MARK A. YOUNG, JUDGE

DR. STEWART LUCAS MURREY, AN INDIVIDUAL, PLAINTIFF, VS. JENNEY LEE, AN INDIVIDUAL; AND DOES 1 THROUGH 50, INCLUSIVE, DEFENDANTS.	CASE NO. 19SMCV01861

REPORTER'S TRANSCRIPT OF PROCEEDINGS
THURSDAY, MARCH 4, 2021

APPEARANCES:

FOR PLAINTIFF:

STEWART LUCAS MURREY, IN PRO PER
1217 WILSHIRE BOULEVARD, # 3655
SANTA MONICA, CALIFORNIA 90403
(APPEARING IN COURT)

FOR DEFENDANT:

JENNEY LEE, IN PRO PER
1431 OCEAN AVENUE, #201
SANTA MONICA, CALIFORNIA 90401
(APPEARING REMOTELY)

DR. MURREY: ALONG WITH THE TECHNICAL ISSUES, SERVICE, SO I THOUGHT THIS ISSUE WAS THE PROBLEM OF SERVICE ON THE 18TH OF DECEMBER 2020, AND THE COURT (UNINTELLIGIBLE) MY CONCERN IS RELEVANT, DESPITE THE FACT A MONTH BEFORE ANOTHER JUDGE HAD, IN FACT, GRANTED ME A TEMPORARY RESTRAINING ORDER AGAINST MS. LEE PRECISELY BECAUSE OF HER HARASSING ME THROUGH HER EMAIL COMMUNICATION.

THE COURT: LET'S BE CLEAR. YOU KEEP BRINGING THIS UP, DR. MURREY. THE REASON YOU HAD A RESTRAINING ORDER AGAINST MR. LEE WAS LARGELY, IN PART, BECAUSE YOU FALSELY STATED THAT MS. LEE HAD SLASHED YOUR TIRES AND —

DR. MURREY: (UNINTELLIGIBLE).

THE COURT: DON'T INTERRUPT ME —

DR. MURREY: (UNINTELLIGIBLE) YOU INTERRUPT ME.

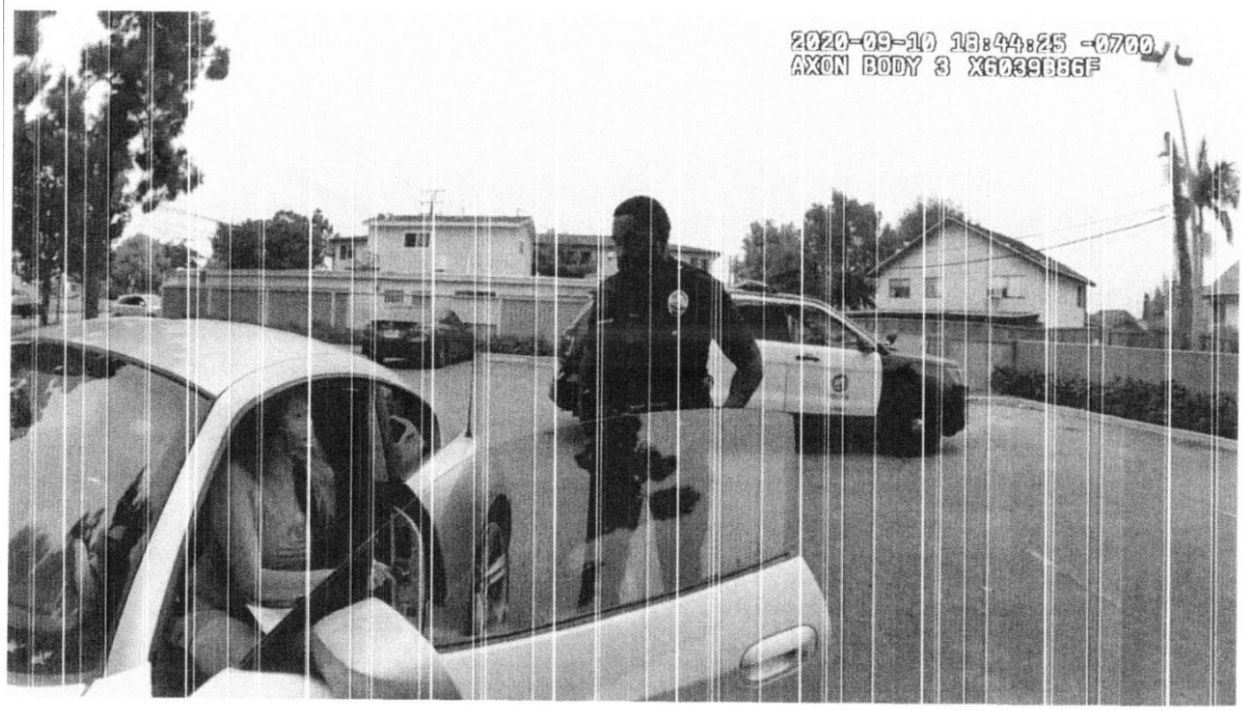
THE COURT: BECAUSE I AM THE COURT, AND THAT IS MY PREROGATIVE TO DO.

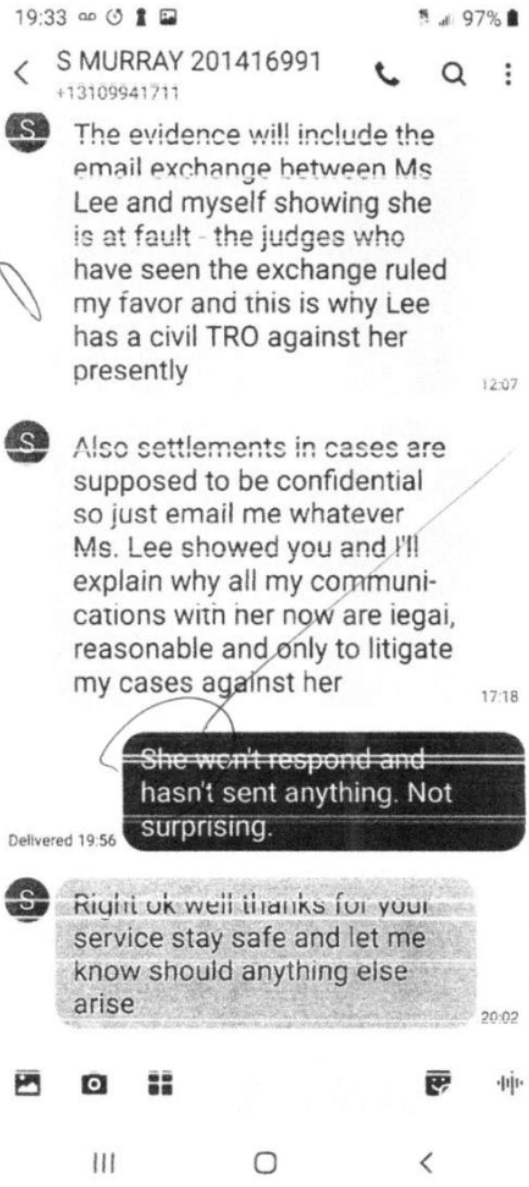
DR. MURREY: EXCUSE ME. GO AHEAD.

THE COURT: DON'T BE A SMART-ASS, DR. MURREY.

DR. MURREY: (UNINTELLIGIBLE).

THE COURT: STOP IT. DO NOT BE A SMART-ASS IN COURT. ALL RIGHT. YOU HAVE FALSELY EARLIER STATED THAT IT WAS AN ATTORNEY WHO SLASHED YOUR TIRES IN THE POLICE REPORT. IT WAS BROUGHT TO THE COURT, THAT EVIDENCE. IT WAS THEN DISPUTED AND THEN YOU CHANGED IT TO MS. LEE. THAT WAS THE BASIS FOR YOUR EARLIER RESTRAINING ORDER,


2020-09-10 13:44:25 -0700
AXON BODY 3 X6039B86F


19:33
97%
S MURRAY 201416991
+13109941711
The evidence will include the email exchange between Ms Lee and myself showing she is at fault - the judges who have seen the exchange ruled my favor and this is why Lee has a civil TRO against her presently
12:07
Also settlements in cases are supposed to be confidential so just email me whatever Ms. Lee showed you and I'll explain why all my communications with her now are legal, reasonable and only to litigate my cases against her
17:18
She won't respond and hasn't sent anything. Not surprising.
Delivered 19:56
Right ok well thanks for your service stay safe and let me know should anything else arise
20:02

From: Michael Moran
Sent: Monday, November 23, 2020 12:14
To: Dr. Lucas Murrey
Subject: Requested information

Good morning

MS Lee filed three reports in the last four years. I handled one of the two involving you. I will be mailing the reports, etc on Tuesday via Certified mail. The DR# is 201416991
One was made at Wilshire Division, but has not been investigated yet. It is being handled by Detective Azmy and the DR is 200714914.

The third, from 2016, was totally unrelated to you. The DR is 160805870.
You will have to order 160805870 and 200714914 from our Records and Identification Division. Their number is 1 213 486 8130. I will include ordering info with the Report and other documentation you requested from me.
Best

Officer Michael Moran
R6119
Pacific Division
MAC Detectives

Sent from Mail for Windows 10

EXHIBIT 19

CH-100 Request for Civil Harassment Restraining Orders

Clerk stamps date here when form is filed.

FILED
Superior Court of California
County of Los Angeles
APR 12 2024
David W. Slayton, Executive Officer/Clerk of Court
By: A. Munoz, Deputy

Read *Can a Civil Harassment Restraining Order Help Me? (form CH-100-INFO)* before completing this form. Also fill out *Confidential CLETS Information (form CLETS-001)* with as much information as you know.

Fill in court name and street address:

Superior Court of California, County of
LOS ANGELES
111 North Hill Street
Los Angeles, CA 90012

CENTRAL DISTRICT

Court fills in case number when form is filed.

Case Number:
24STR002552

1 Person Seeking Protection

a. Your Full Name:
Vanessa Valdes Age: 38
Your Lawyer *(if you have one for this case)*
Name: _____ State Bar No.: _____
Firm Name: _____

b. Your Address *(If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or email.)*
Address: 1825 Ivar Ave
City: Los Angeles State: CA Zip: 90028
Telephone: _____ Fax: _____
Email Address: _____

2 Person From Whom Protection Is Sought

Full Name: Stewart Lucas Murrey AKA Dr. Stewart Lucas Murrey, Lucas Murrey Age: 49
Address *(if known)*: 1217 Wilshire Blvd P.O. Box #3655
City: Santa Monica State: CA Zip: 90403

3 Additional Protected Persons

a. Are you asking for protection for any other family or household members? ☐ Yes ☒ No *If yes, list them:*

Full Name	Gender	Age	Lives with you?	How are they related to you?
			☐ Yes ☐ No	
			☐ Yes ☐ No	
			☐ Yes ☐ No	
			☐ Yes ☐ No	

☐ *Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025,* Attachment.

b. Why do these people need protection? *(Explain below):*

☐ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.*

This is not a Court Order.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Stanley Mosk Dept. - 25

24STRO02552
Valdes, Vanessa
vs
Murrey, Stewart Lucas

July 11, 2024
8:30 AM

Honorable Richard Bloom, Judge

C. Piedra, Judicial Assistant
Presley Rodriguez, Court Services Assistant

Angelica Orsat(#14385), Court Reporter

NATURE OF PROCEEDINGS: Petition - Civil Harassment (violence) filed by Petitioner on April 12, 2024

The following parties are present for the aforementioned proceeding:

Stewart Lucas Murrey, Respondent
(via LACourtConnect)
Vanessa Valdes, Petitioner

The matter is called for hearing.

The Court advises the Respondent of the consequences on the issuance of a permanent restraining order.

Respondent acknowledges and understands the consequences of a permanent restraining order.

Both parties represent to the Court that they are prepared to proceed today.

Both parties are placed under oath and testify.

Petitioner's Exhibit 1 (Petition) is admitted into evidence by reference only.

The Court receives Petitioner's Declaration as direct testimony.

After review of the moving and responsive papers, and upon consideration of the testimony and evidence presented by the parties, the Court rules as follows:

Petitioner’s Request for a Restraining Order is denied. The Court finds Petitioner has failed to sustain their burden of proof. All temporary orders, if any, are dissolved.

Both parties are present at the time the Court makes its order. Further notice is not required.

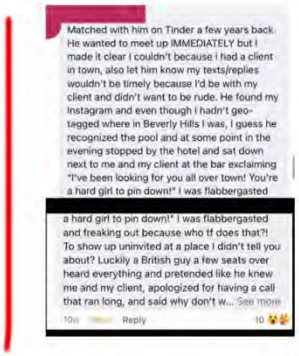
EXHIBIT 20

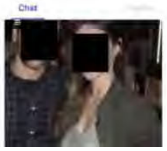
- If you have any other pertinent **INFO** you'd like to share, please include "*INFO*" in the subject line.
- If you're reaching out as a member of the **MEDIA**, please include "*MEDIA*" in the subject line.

Thank you for reading, donating and sharing, **we appreciate every bit of support!** Please stay safe out there!

Sincerely,

Vanessa Valdes, Olivia Burger, Kelly Gibbons, Amy Blalock, Elly Shariat, and Kelyn Rodriguez.


Matched with him on Tinder a few years back. He wanted to meet up IMMEDIATELY but I made it clear I couldn't because I had a client in town, also let him know my texts/replies wouldn't be timely because I'd be with my client and didn't want to be rude. He found my Instagram and even though I hadn't geo-tagged where in Beverly Hills I was, I guess he recognized the pool and at some point in the evening stopped by the hotel and sat down next to me and my client at the bar exclaiming "I've been looking for you all over town! You're a hard girl to pin down!" I was flabbergasted
a hard girl to pin down!" I was flabbergasted and freaking out because who tf does that?! To show up uninvited at a place I didn't tell you about? Luckily a British guy a few seats over heard everything and pretended like he knew me and my client, apologized for having a call that ran long, and said why don't w... See more
10w
Reply
10



Chat
Wait you already did
Why is there a guy in your pic genius?
I'm amused by how you think you know me well enough to talk to me like one of your buddies.

$5,747 raised

Share

The organizer has currently disabled new donations to this fundraiser.

This fundraiser is located near you

Misty Alderaan
$25 · 1 mo

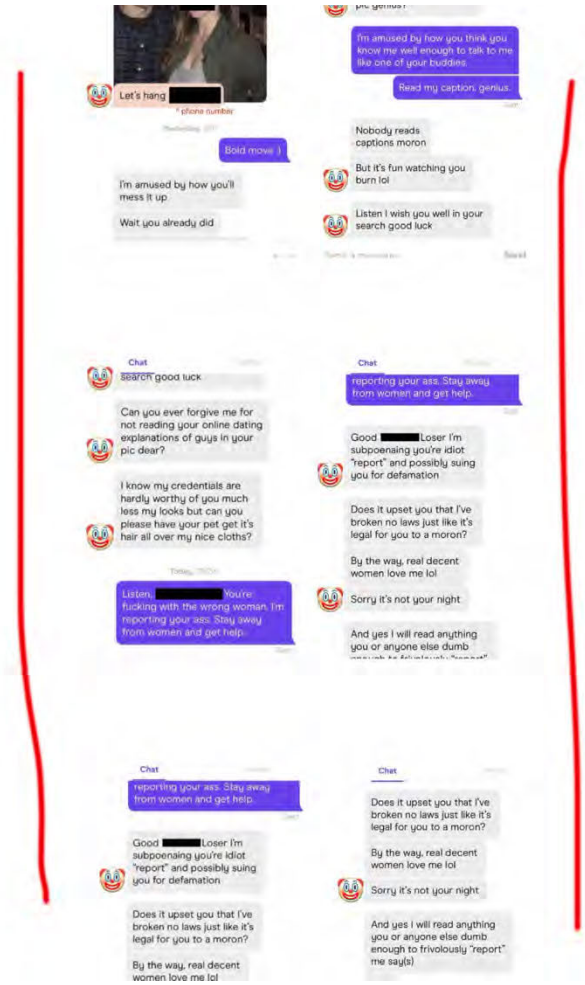
Anonymous
$100 · 1 mo

Anonymous
$10 · 1 mo

Scout Bartlett
$25 · 2 mos

Anonymous
$100 · 2 mos

See all | See top


Let's hang [redacted]
* phone number
Bold move ;)
I'm amused by how you'll mess it up
Wait you already did
I'm amused by how you think you know me well enough to talk to me like one of your buddies
Read my caption genius
Nobody reads captions moron
But it's fun watching you burn lol
Listen I wish you well in your search good luck
Chat
search good luck
Can you ever forgive me for not reading your online dating explanations of guys in your pic dear?
I know my credentials are hardly worthy of you much less my looks but can you please have your pet get it's hair all over my nice cloths?
Listen, [redacted] You're fucking with the wrong woman. I'm reporting your ass. Stay away from women and get help.
Chat
reporting your ass. Stay away from women and get help.
Good [redacted] Loser I'm subpoenaing you're idiot "report" and possibly suing you for defamation
Does it upset you that I've broken no laws just like it's legal for you to a moron?
By the way, real decent women love me lol
Sorry it's not your night
And yes I will read anything you or anyone else dumb
Chat
reporting your ass. Stay away from women and get help.
Good [redacted] Loser I'm subpoenaing you're idiot "report" and possibly suing you for defamation
Does it upset you that I've broken no laws just like it's legal for you to a moron?
By the way, real decent women love me lol
Chat
Does it upset you that I've broken no laws just like it's legal for you to a moron?
By the way, real decent women love me lol
Sorry it's not your night
And yes I will read anything you or anyone else dumb enough to frivolously "report" me say(s)

$5,747 raised

Share

The organizer has currently disabled new donations to this fundraiser.

This fundraiser is located near you

Misty Alderaan
$25 · 1 mo

Anonymous
$100 · 1 mo

Anonymous
$10 · 1 mo

Scout Bartlett
$25 · 2 mos

Anonymous
$100 · 2 mos

See all | See top

Legal Defense Fund for Women of LA

Anonymous Defendant is organizing this fundraiser.

Donation protected

Hi, thank you for taking the time to read this account of what has been our unfortunate reality over the past several months. This GoFundMe is for the currently named and active defendants in our Los Angeles defamation case.

$5,747 raised

Share

The organizer has currently disabled new donations to this fundraiser.

This fundraiser is located near you

Misty Alderaan
$25 · 1 mo

Anonymous
$100 · 1 mo

Anonymous
$10 · 1 mo

Scout Bartlett
$25 · 2 mos

Valdes wilfully appearing on national and international news media outlets to smear respondent and wherein Valdes names herself, respondent and discusses LASC case no. 23stcv14890, Dr. Murrey v. Gibbons et al. Links to just a fraction of said videos are below:

https://www.youtube.com/watch?v=-1RU7pEZ2bw

https://www.youtube.com/watch?v=6BqiMmt5WZ4

https://www.youtube.com/watch?v=3gbZlnvlgCw

https://www.youtube.com/watch?v=XHbHYw_KnYo

www.youtube.com › watch

Women respond to suit by man over negative Facebook posts ...

" Olivia Burger and **Vanessa Valdes** talk about their encounters with Stewart **Lucas Murrey**. He's claiming defamation, sex-based discrimination ...

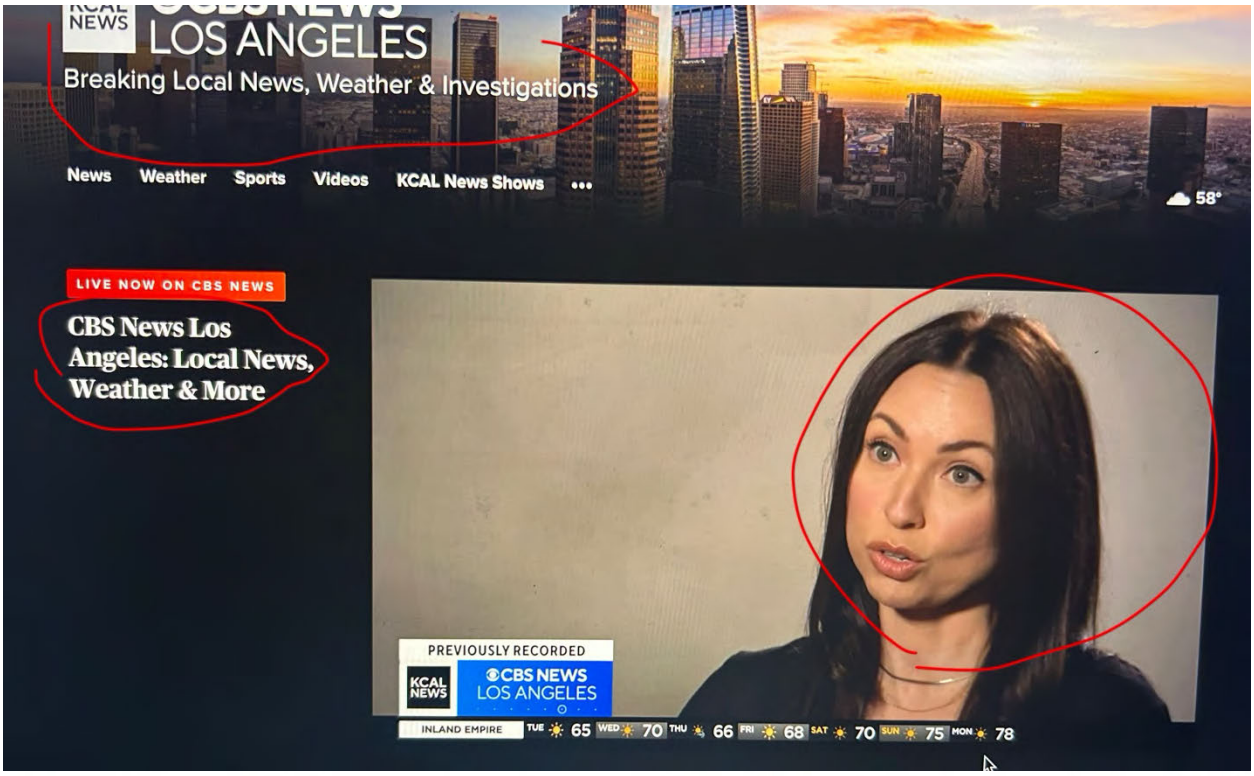
YouTube · NewsNation · Mar 24, 2024

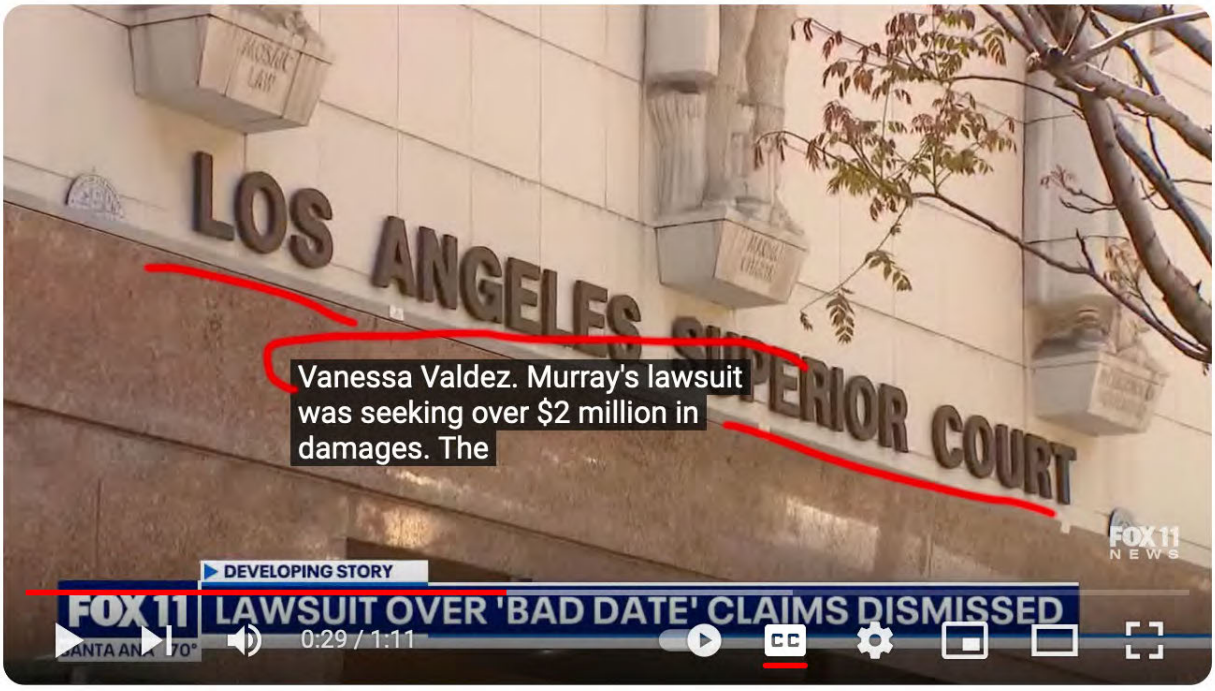
www.youtube.com › watch

'Are We Dating The Same Guy' lawsuit press conference

Several women, including **Vanessa Valdez** and Olivia Berger, are facing a legal battle after being sued by Stuart **Lucas Murray** for defamation ...

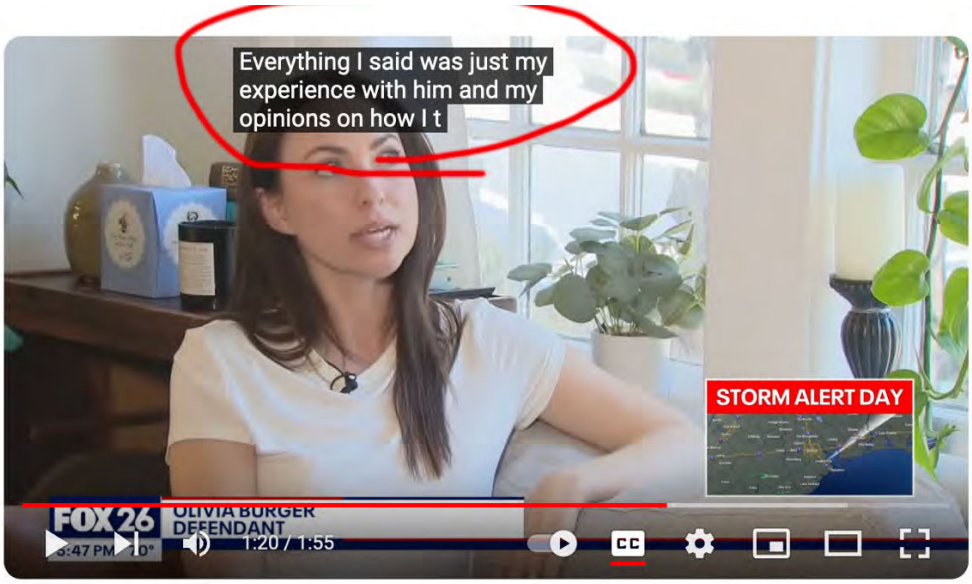
YouTube · FOX 11 Los Angeles · Mar 21, 2024




LOS ANGELES SUPERIOR COURT
Vanessa Valdez. Murray's lawsuit was seeking over $2 million in damages. The
FOX 11 NEWS
DEVELOPING STORY
FOX 11
LAWSUIT OVER 'BAD DATE' CLAIMS DISMISSED
0:29 / 1:11
CC

Lawsuit over 'bad date' claims dismissed

FOX 11 Los Ang...
980K subscribers
Subscribe
15
Share


Everything I said was just my experience with him and my opinions on how I t
STORM ALERT DAY
FOX 26
OLIVIA BURGER
DEFENDANT
1:20 / 1:55

California man suing women for $2M over Facebook group comments

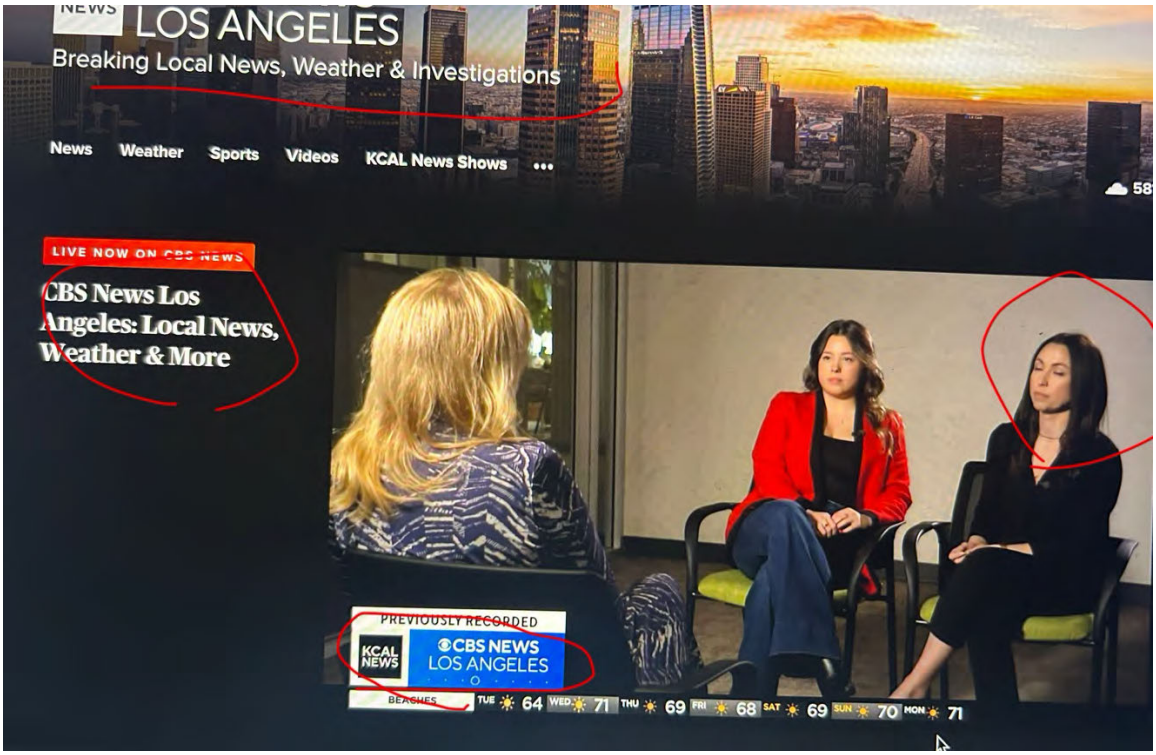
FOX 26 Houston
537K subscribers
Subscribe
19
Share

1.2K views 3 months ago

THE THEY WERE PRETTY A
CONSPIRACY THEORY ASK.
NEWS NATION
'ARE WE DATING THE SAME GUY?'
GROUP SUED BY MAN AFTER ONLINE COMMENTS
1:54 / 5:04

Women respond to suit by man over negative Facebook posts about dating him | NewsNation Prime

NewsNation
1.36M subscribers
Subscribe
189
Share



that they did nothing wrong by posting their opinions in a private online group called
DEVELOPING STORY
FOX 11 LAWSUIT OVER 'BAD DATE' CLAIMS DISMISSED
FOX 11 NEWS
5:17
0:34 / 1:11

Lawsuit over 'bad date' claims dismissed

FOX 11 Los Ang... ✓
980K subscribers

Subscribe

15 | Share | ...

Are We Dating The Same Guy? | Los Angeles
Open to messaging
Tea in comments if approved- but I'm curious if anyone has met "Lucas" in person (I'm not sure if that's even his real name)
Now, the first of numerous lawsuits filed by Stuart Lucas against Stuart Lucas, Murray
Are We Dating The Same Guy? | Los Angeles
Private group · 52.4K members
FOX 11
0:15 / 1:11

Lawsuit over 'bad date' claims dismissed

FOX 11 Los Ang... ✓
980K subscribers

Subscribe 15 Share ⋯

KTLA 5 LA'S VERY OWN | Watch Live | News | Weather | Morning News | Video | Shows

Another defendant, Vanessa Valdes, said she connected with Murrey on the dating app Hinge.

| **Man devoted to eliminating squatters taking over Southern California homes ›**

"Right out of the gate, gave me his phone number and said, 'Let's hang,'" she recalled. "I commented with one message saying, 'Bold move' with a happy face, and then a barrage of harassing messages came afterward. So I immediately blocked him and reported him."

A few years later, Valdes commented on a post in the Facebook group about her experience with Murrey.

"I shared my personal experience, truthful, and my opinions on his behavior and now I'm being sued," Valdes said. "It's unfortunate that we're here, but I'm happy to provide all the evidence and get through this. Hopefully, justice will prevail."

In a statement to KTLA, Murrey denied all allegations and comments made by the women, saying in part:

"For years, key defendants obsessively tracked, stalked and incited harassment against me. These are women with whom I had little to no interaction. In every case of interaction, I rejected each one of them and cut them off, quite swiftly. Instead of going their separate ways, they went on for months and years to spread misinformation about me and countless others. Their actions were deliberate, and now they are playing the victims."

asking people to share any experiences they had with him.

Vanessa Valdes, another defendant, said that the Facebook group is a platform for sharing personal experiences and opinions.

"Everything I said was just my experience with him and my opinions on how I think, you know, he should not be on dating sites," she told Los Angeles Fox affiliate KTTV.

Valdes says that she exchanged messages with Murray but never actually went on a date with him due to his offensive messages. She says he called her a "moron" and told her "it's fun watching you burn."

The defendants have filed various responsive motions, including a request to strike down the lawsuit under California's anti-SLAPP law, which is aimed at preventing lawsuits that are filed for the purpose of shutting down protected speech.

"Despite the fact that this lawsuit is completely frivolous and a bullying attempt by Plaintiff against Defendant Blalock it is an illegal attempt to restrain and punish Blalock's valid exercise of her constitutional right to freedom of speech, especially with the intent of public safety," writes defendant Amy Blalock in her motion, which has been reviewed by Law&Crime.

10:23

thetimes.co.uk

MENU THE TIMES THURSDAY APRIL 11 2024 Subscribe

Vanessa Valdes and Olivia Berger are among the defendants in the defamation and privacy case brought by Stewart Lucas Murrey

Man sues more than 50 women for calling him a bad date

Stewart Lucas Murrey is seeking $2.1m in compensation after negative stories were shared about him on the online group 'Are We Dating the Same Guy?'

Harriet Alexander, New York

Monday April 08 2024, 6.45pm BST, The Times

16

Mr. Murrey, who has a long history of filing lawsuits related to defamation, claims he tried to join the Awdtsg group to defend himself, but was repeatedly denied membership. He is calling his female tormentors "femcels," a play on "incels," a term that describes "involuntarily celibate" men who deeply resent how women reject them even when these women should, in their view, be sexually submissive to them. Several self-identified incels have been the perpetrators of fatal mass shootings.

Vanessa Valdes, a defendant in Mr. Murrey's lawsuit, says she only told the truth on the Facebook group about what she says was a terrible online dating interaction with Mr. Murrey. KTLA

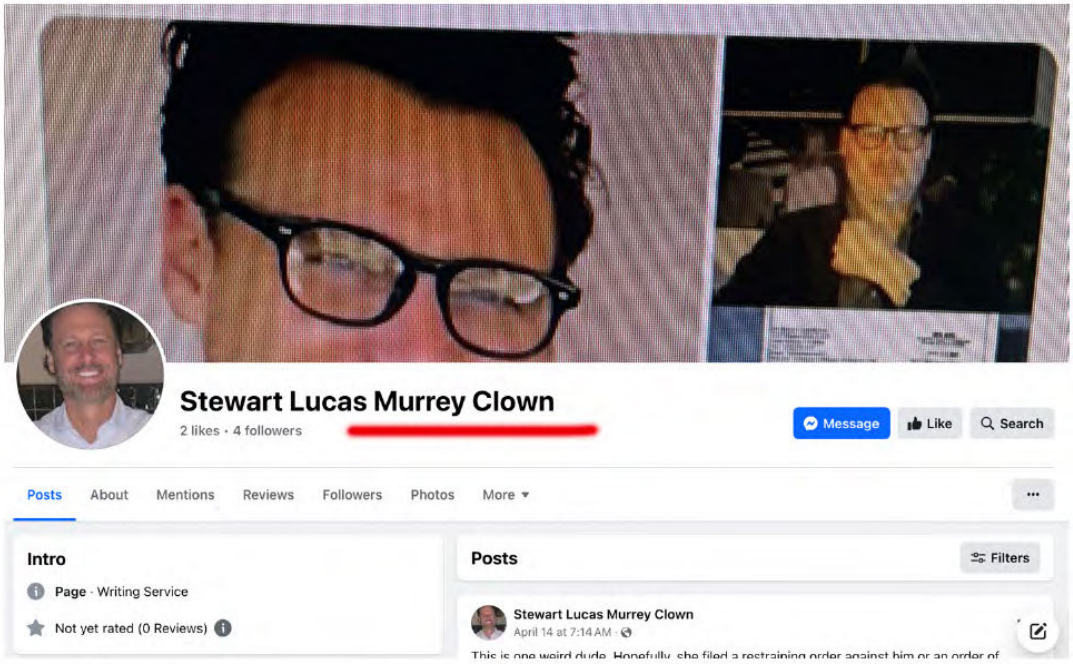
ADVERTISEMENT

defamation actually harassed them on dating apps, defendants say

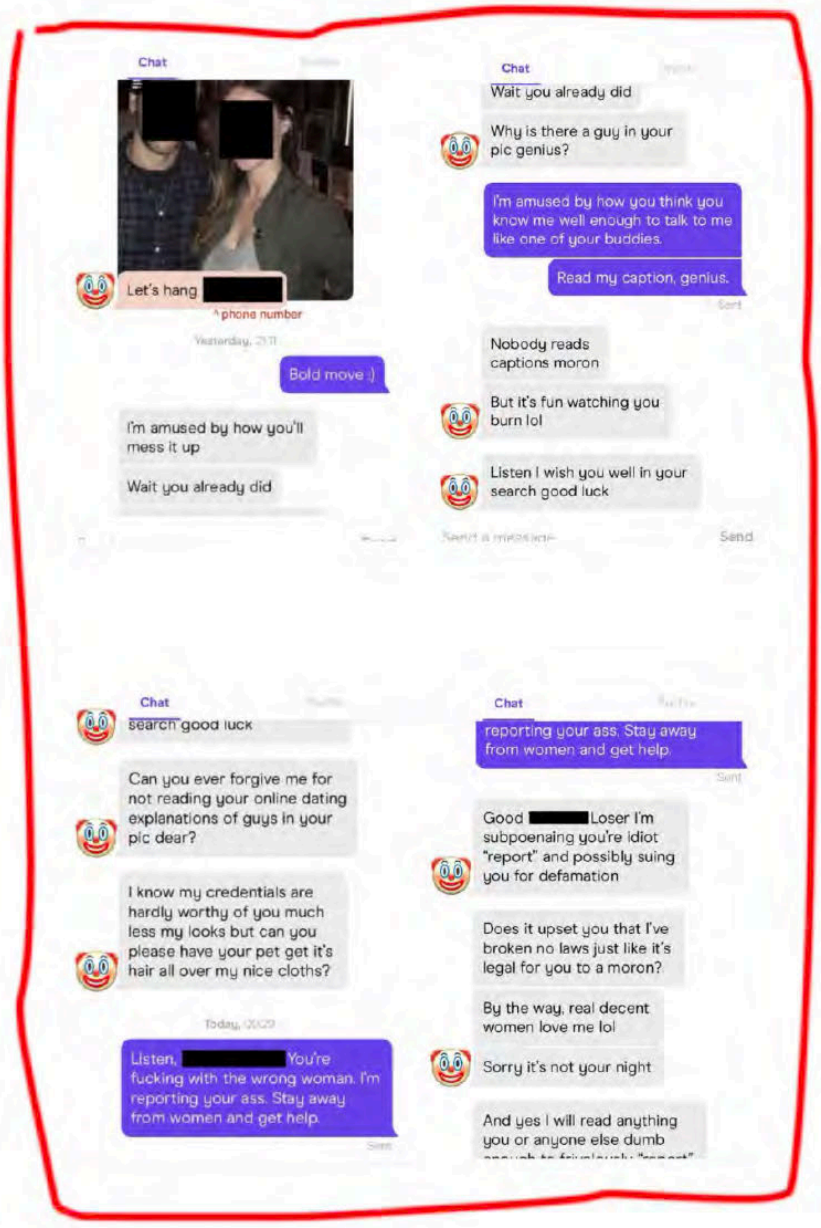
MARISA SARNOFF | Mar 24th, 2024, 9:43 am

8 comments

SHARE


Stewart Lucas Murrey Clown
2 likes · 4 followers
Message
Like
Search
Posts
About
Mentions
Reviews
Followers
Photos
More
Intro
Page · Writing Service
Not yet rated (0 Reviews)
Posts
Filters
Stewart Lucas Murrey Clown
April 14 at 7:14 AM

Valdes “doxing” private text-messages with respondent from 2019 in a degrading style with clown emojis on her GoFundMe webpage just like she did in said AWDTSG Facebook forums


Chat
Let's hang [redacted]
^phone number
Bold move ;)
I'm amused by how you'll mess it up
Wait you already did
Chat
Wait you already did
Why is there a guy in your pic genius?
I'm amused by how you think you know me well enough to talk to me like one of your buddies.
Read my caption, genius.
Nobody reads captions moron
But it's fun watching you burn lol
Listen I wish you well in your search good luck
Send
Chat
search good luck
Can you ever forgive me for not reading your online dating explanations of guys in your pic dear?
I know my credentials are hardly worthy of you much less my looks but can you please have your pet get it's hair all over my nice cloths?
Listen, [redacted] You're fucking with the wrong woman. I'm reporting your ass. Stay away from women and get help.
Chat
reporting your ass. Stay away from women and get help.
Good [redacted] Loser I'm subpoenaing you're idiot "report" and possibly suing you for defamation
Does it upset you that I've broken no laws just like it's legal for you to a moron?
By the way, real decent women love me lol
Sorry it's not your night
And yes I will read anything you or anyone else dumb

4:18

Kcg Gib
3d ·

Most relevant

R.C. Salane
Pardon what do you mean this weirdo showed up at your home?? This story truly gets wilder at every turn.

3d Like

Kcg Gib
R.C. truuuuly

3d Like

Mark DeLisle
R.C. Salane dude showed up to serve her. She's never even met him in person and he knew where she lived and showed up personally.

Dude should have been put 6ft under in the desert somewhere with some pepper on top already.

Kcg Gib I only know you through Michele but I read the article last night... insane. I'd say this guy should be in a mental institution but he's past that, he needs to be deleted.

Sorry you're going through this.

Anonymous member · 21h ·

Anonymous member

Pretty sure he got the ktla tik tok covering this taken down somehow

This guy lives in my building and every convo felt off and he was very pompous from the get go. Other women in my building have told me about him being weird after we have seen him around. They'd be like oh that dude is weird and I'd be like glad it wasn't just me being judgey. I don't see him often but when I do I often see the same girl with him. So he may have a gf that doesn't live with him.

I went on a deep dive last night and just googling his name shows the many lawsuits he has been apart of. Also his instagram and twitter are pretty unhinged and feature screenshots from the women he is suing . His LinkedIn in also really sparse for the way he talks himself up academically and professionally 🥹

If there's anyway I can help the women he's accusing , please let me know !

21h Like Reply 3

Rules

Write a comment... GIF

EXHIBIT 21

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT 25 HON. RICHARD BLOOM, JUDGE

-OOO-

VANESSA VALDES,

PETITIONER/RESPONDENT,

VS. NO. 24STRO02552

STEWART LUCAS MURREY,

RESPONDENT/PETITIONER.

AND RELATED CASE NOS. 24STRO03710; 24STRO04181; 24STRO04183.

CERTIFIED TRANSCRIPT

REPORTER'S TRANSCRIPT OF PROCEEDINGS

THURSDAY, JULY 11, 2024

APPEARANCES:

FOR THE PETITIONER/ RESPONDENT: VANESSA VALDES IN PROPRIA PERSONA

FOR THE RESPONDENT/ PETITIONER: STEWART LUCAS MURREY IN PROPRIA PERSONA

ANGELICA ORSAT, CSR NO. 14385
OFFICIAL REPORTER

THE COURT: -- IT IS MORE -- THAT'S MORE SUMMARY IN NATURE. IT DOESN'T REALLY GIVE THE COURT FACTS TO RELY ON.

APRIL 11TH, HE BEGAN POSTING IMAGES OF MY -- MY ANTI-SLAPP MOTION THAT CONTAINED MY HOME ADDRESS, MY PHONE NUMBER, MY WORK EMAIL ADDRESS, I BELIEVE, MY EMAIL ADDRESS, AND -- ON HIS PERSONAL PUBLIC BLOCKCHAIN WEBSITES. IT IS MY UNDERSTANDING THAT BLOCKCHAIN WEBSITES, WHEN SOMETHING IS PUBLISHED, CANNOT BE DELETED. SO IT WILL ALWAYS HAVE A TRACE OF THAT INFORMATION OUT THERE. I HAVE SINCE HAD TO RAMP UP HOME SECURITY. I HAVE BEEN INCREDIBLY STRESSED AND PARANOID AT HOME. HE CONTINUES TO HARASS ME THROUGH THE LEGAL SYSTEM AND THROUGH HIS POSTS ONLINE.

THE COURT: HOW SO? HOW SO HAS HE CONTINUED TO HARASS YOU? AGAIN, WHEN YOU SAY, "HE'S HARASSED ME THROUGH THE LEGAL SYSTEM" --

THE PETITIONER: YES.

THE COURT: -- IT IS MORE -- THAT'S MORE SUMMARY IN NATURE. IT DOESN'T REALLY GIVE THE COURT FACTS TO RELY ON.

THE PETITIONER: IN HIS -- IN HIS MOTIONS AND HIS CASES AGAINST ME, HE MAKES FALSE CLAIMS ABOUT MY ACTIONS, MY WORDS. HE HAS NO EVIDENCE TO BACK IT UP. AND IN HIS PUBLIC POSTINGS, HE ALSO MAKES FALSE CLAIMS ALLUDING TO MY ALLEGED AFFILIATION WITH JEFFREY EPSTEIN, GHISLAINE MAXWELL, THE ITALIAN MOB, THE ISRAELI GOVERNMENT, AND THE CIA.

THE COURT: HOW DOES HE DO THAT?

THE PETITIONER: I'M SORRY?

THE COURT: HOW DOES HE DO THAT?

YOU HAVE NOT BEEN SWORN AT THIS TIME; SO I'M GOING TO ASK YOU BOTH TO RAISE YOUR RIGHT HANDS AND BE SWORN.

THE CLERK: DO YOU AND EACH OF YOU SOLEMNLY STATE UNDER PENALTY OF PERJURY THAT THE TESTIMONY YOU MAY GIVE IN THE CAUSE NOW PENDING BEFORE THIS COURT SHALL BE THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH?

THE PETITIONER: I DO.

THE CLERK: THANK YOU.

IF YOU CAN EACH STATE YOUR NAME FOR THE RECORD.

THE PETITIONER: VANESSA VALDES.

THE CLERK: WE DIDN'T GET A RESPONSE FROM RESPONDENT.

THE RESPONDENT: I DO.

DR. STEWART LUCAS MURREY.

THE CLERK: THANK YOU.

YOU MAY BE SEATED.

THE COURT: ALL RIGHT. SO, MS. VALDES, YOU MAY PROCEED TO PROVIDE YOUR TESTIMONY TO THE COURT AT THIS TIME AS TO WHY YOU BELIEVE CIVIL HARASSMENT RESTRAINING ORDERS ARE APPROPRIATE IN THIS CASE. THE BURDEN THAT EACH OF YOU HAVE IN THIS MATTER IS TO SHOW BY CLEAR AND CONVINCING EVIDENCE. IT IS A HIGH BURDEN. IT IS WELL BEYOND PREPONDERANCE OF THE EVIDENCE THAT EXISTS FOR MOST OF OUR OTHER RESTRAINING ORDER CONTEXTS LIKE DOMESTIC VIOLENCE. SO PLEASE PROCEED.

THE PETITIONER: THANK YOU, YOUR HONOR.

28 THE COURT: HOW IS HIS BEHAVIOR DIFFERENT FROM

09-18-2024 2:18PM

1 YOURS IN ATTEMPTING TO MAKE PUBLIC HIS ACTIONS THAT YOU
2 FOUND OFFENSIVE?

17 THE COURT: GO AHEAD.
18 THE PETITIONER: MR. MURREY ALSO CREATED HIS OWN
19 GOFUNDME AND HAS POSTED ON HIS WEBSITES CALLING FOR
20 ACTION FROM HIS SUPPORTERS TO REACH OUT, YOU KNOW, LET --
21 HE SAYS, "LET ME KNOW YOUR THOUGHTS. WE NEED TO RISE UP
22 AGAINST THIS INJUSTICE." ON HIS INSTAGRAM, HE POSTS
23 THINGS THAT SAY, "ALL OF MY DEFENDANTS ARE PRO-ISRAEL
24 STATE VIOLENT PSYCHOPATHS." AGAIN, COMPLETELY FALSE AND
25 HYSTERICAL AND INFLAMMATORY, AND I REALLY DO FEAR FOR MY
26 SAFETY BECAUSE MY HOME ADDRESS IS NOW POSTED ON THOSE
27 BLOCKCHAIN WEBSITES OF MURREY'S.
28 THE COURT: HOW IS HIS BEHAVIOR DIFFERENT FROM

09-18-2024 2:18PM

Page 25

1 YOURS IN ATTEMPTING TO MAKE PUBLIC HIS ACTIONS THAT YOU
2 FOUND OFFENSIVE?
3 THE PETITIONER: WELL, MINE WERE TRUE, AS WAS FOUND
4 BY THE COURT, BY HONORABLE KEOSIAN -- JUDGE KEOSIAN.
5 EVERYTHING THAT I HAVE STATED ONLINE WAS FACTUAL
6 INFORMATION WITH IMAGES OF THE HARASSMENT THAT HE BROUGHT
7 AGAINST ME DURING OUR HINGE CONVERSATION. I GAVE MY
8 OPINION THAT HE SHOULD NOT BE ON DATING APPS, AND I HAVE
9 NOT POSTED ANYTHING ABOUT HIM SINCE.
10 EVERYTHING HE HAS POSTED ABOUT ME HAS BEEN
11 FALSE. I HAVE EVIDENCE TO BACK IT UP, AND THERE ARE SOME
12 THINGS I CAN'T PROVE BECAUSE, YOU KNOW, IT'S LIKE ASKING
13 IF YOU'RE SANTA CLAUS. YOU CAN'T PROVE THAT YOU'RE NOT.

COLLEAGUES' FACES, IT BRINGS ME A LOT OF STRESS AND ANXIETY THAT PEOPLE NOW KNOW WHERE I LIVE, AND THEY MAY THINK THAT THESE ALLEGATIONS ARE TRUE WHEN THEY'RE OUTRAGEOUS AND INDECENT AND VERY FALSE.

THE COURT: GO AHEAD.

THE PETITIONER: HE -- I'M SORRY. SINCE -- SINCE HIS OUTRAGEOUS SLAPP LAWSUIT AGAINST ME, SOME OF MY CO-DEFENDANTS AND I DID COME TOGETHER TO FIGURE OUT HOW TO NAVIGATE THIS TOGETHER. OUR CASES ARE NOT AFFILIATED WITH EACH OTHER IN ANY WAY, BUT WE WERE STILL INVOLVED IN THE SAME CASE NUMBER. SO WE DID CREATE A GOFUNDME AND ALSO AN EMAIL ADDRESS TIED TO THAT GOFUNDME FOR ANY REPRESENTATION THAT WOULD HELP US.

AND IN THAT EMAIL ADDRESS, WE DID RECEIVE SOME HATE MAIL IF -- THAT IS EXHIBIT E -- DUE TO MURREY'S INFLAMMATORY LANGUAGE AND FALSE ACCUSATIONS ABOUT US. THIS WAS THE MAIL WE RECEIVED.

THE COURT: ALL RIGHT. I'M LOOKING AT EXHIBIT E.

THE PETITIONER: WOULD YOU LIKE ME TO READ THAT ALOUD FOR THE COURT? IT'S PRETTY EXPLICIT. IT'S VULGAR.

THE COURT: WELL, I'M NOT SURE WHICH PAGE YOU'RE ASKING THE COURT TO LOOK AT, FIRST OF ALL. THE FIRST PAGE?

THE PETITIONER: I ONLY HAVE ONE EXHIBIT [SIC] FOR EXHIBIT E. IT IS --

THE COURT: OH, INDEED. I SEE. IT'S ONE PAGE. IT SAYS --

THE PETITIONER: YES.

BRIEF TESTIMONY.

THE COURT: GO AHEAD.

THE RESPONDENT: WHAT IS THE EMAIL ADDRESS -- WHAT IS THE EMAIL ADDRESS THAT SENT THE DIGITAL HATE MAIL?

BECAUSE I KNOW I'M UNDER OATH, AND I DID NOT SEND THAT. VALDES AND HER SUPPORTERS -- AND WE'RE TALKING ABOUT MILLIONS OF PEOPLE ON FACEBOOK, WHICH I NEVER USED -- MADE FUN OF ME FOR HAVING ZERO FOLLOWERS, BUT SHE'S SAYING THAT MY SUPPORTERS ARE SOMEHOW HARASSING. SO I WOULD LIKE THE EMAIL -- THE FULL EMAIL ADDRESS -- NAME AND THE EMAIL ADDRESS WHERE THAT DIGITAL HATE MAIL WAS ALLEGEDLY RECEIVED.

THE COURT: ALL RIGHT. I'M NOT GOING TO REQUIRE THE PETITIONER TO REVEAL HER OWN EMAIL ADDRESS IF THAT'S WHAT YOU'RE ASKING.

THE RESPONDENT: I'M NOT -- I JUST -- I KNOW I DIDN'T SEND THAT EMAIL, AND NO ONE RELATED TO ME SENT IT. SO I'D LIKE TO EITHER GET A CONTINUANCE AND --

THE COURT: ALL RIGHT. SO THAT'S YOUR TESTIMONY.

THE RESPONDENT: UH-HUH. THAT'S -- OKAY. I THOUGHT I WOULD HAVE A RIGHT TO CONFIRM THAT IN CASE MS. VALDES IS COMMITTING FRAUD ON THE COURT AND SENDING HERSELF FAKE EMAILS TO INCRIMINATE ME. THERE IS ACTUALLY ONE STATEMENT THAT VALDES AND HER CO-CONSPIRATORS MADE WHERE THEY SAID, "LET'S HIRE A DECOY TO NAIL HIS ASS." I HAVE THAT IN AN EXHIBIT SOMEWHERE, BUT IF THE COURT WON'T ALLOW ME TO FIND OUT THE EMAIL ADDRESS THAT I'M BEING ACCUSED OF BEING RELATED TO, WHICH I HAVE NO RELATION TO,

I GUESS I'LL MOVE FORWARD. I'D LIKE TO HAVE THAT ON RECORD, THOUGH; I WAS NEVER ABLE TO DO ANY DISCOVERY ON THIS.

THE COURT: YOU CAN GIVE SOME IDENTIFYING INFORMATION FROM THE EMAIL ADDRESS BUT NOT THE ENTIRE EMAIL ADDRESS, LIKE EMAIL ADDRESS THAT ENDS IN A CERTAIN WORD OR SOMETHING LIKE THAT.

THE RESPONDENT: OKAY. SURE.

THE COURT: IT IS YOUR -- SIR, IT IS YOUR BURDEN OF PROOF, JUST AS IT IS MS. VALDES'S, TO PROVE YOUR CASE. YOU BEAR THE BURDEN --

THE RESPONDENT: IF THE COURT --

THE COURT: -- OF SHOWING THE EVIDENCE.

THE RESPONDENT: I UNDERSTAND. WOULD THE COURT GIVE ME A WEEK TO DO DISCOVERY TO FIND OUT WHO SENT THAT EMAIL SO I CAN CONFIRM THAT IT HAS NOTHING TO DO WITH ME?

THE COURT: NO. WE'RE HAVING THE HEARING NOW.

THE RESPONDENT: OKAY. THEN --

THE COURT: DO YOU HAVE AN ANSWER?

I'M ASKING MS. VALDES IF SHE HAS A RESPONSE.

THE PETITIONER: I DO HAVE A RESPONSE.

THAT EMAIL WAS NOT MADE BY ME -- THE EMAIL ADDRESS WHERE THE HATE MAIL WAS SENT. IT WAS A GROUP EMAIL ADDRESS FOR THE DEFENDANTS OF THAT CASE THAT WAS PUBLISHED ON THE GOFUNDME FOR ANY HELP TO CONTACT US THERE. SO TO PROTECT US, WE DIDN'T USE OUR -- OUR EMAIL ADDRESSES. SO I DON'T KNOW OFF THE TOP OF MY HEAD. IT WAS SOMETHING ABOUT LADEFENDANTGALS OR SOMETHING.

BUT I JUST WANT TO MAKE IT CLEAR THAT I NEVER ALLEGED THAT HE SENT IT. I'M JUST ALLEGING THAT BECAUSE OF HIS INFLAMMATORY LANGUAGE AND FALSE ACCUSATIONS ABOUT US, WE HAVE, THEN, AS A RESULT, RECEIVED THIS KIND OF MAIL FROM PEOPLE.

THE COURT: I SEE. ALL RIGHT. GO AHEAD, SIR.

THE RESPONDENT: OKAY. WELL, FIRST OF ALL, MS. VALDES IS TALKING ABOUT A LESS-THAN-TWO-MINUTE TEXT CONVERSATION FROM 2019 --

THE COURT: ARE YOU ON TO TESTIMONY NOW, OR ARE YOU ASKING QUESTIONS?

THE RESPONDENT: -- AND SHE --

WELL, I WOULD -- IT SEEMS -- I THINK THAT THE MAIN THING THAT I WOULD LIKE TO GET FROM ASKING QUESTIONS IS THE FULL EMAIL ADDRESS OF WHAT WAS -- WHAT THE EMAIL ADDRESS WAS THAT SENT THAT ALLEGED DIGITAL HATE MAIL TO MS. VALDES.

THE COURT: SHE HAS ANSWERED YOUR QUESTION IN THAT REGARD.

THE RESPONDENT: I DIDN'T HEAR ANY PARTICULAR -- SHE ONLY SPOKE OF THE EMAIL ADDRESS TO WHICH IT WAS SENT, I BELIEVE, YOUR HONOR, NOT THE EMAIL ADDRESS ITSELF.

THE COURT: I'M SORRY. NOT THE EMAIL ADDRESS THAT WHAT?

THE PETITIONER: HE WANTS TO KNOW WHO IT CAME FROM.

THE RESPONDENT: WHO SENT IT.

THE COURT: OH, WHO IT CAME FROM?

THE RESPONDENT: YES. I WANT TO KNOW -- YES.

THE COURT: DO YOU KNOW WHO IT CAME FROM?
THE PETITIONER: I DO NOT KNOW. IT JUST SAYS J.C. ROUX, R-O-U-X.
THE RESPONDENT: THAT'S NOT AN EMAIL ADDRESS.
THE PETITIONER: THAT'S ALL I HAVE.
THE COURT: THAT'S YOUR ANSWER.
THE RESPONDENT: OKAY. WELL, I GUESS I COULD MOVE FORWARD WITH THE FACT THAT MS. VALDES FAILED TO FILE -- FAILED TO EVEN PROVIDE THE EMAIL ADDRESS THAT SHE ALLEGEDLY --
THE PETITIONER: YOUR HONOR --
THE COURT: YOU CAN -- NO. WE'RE NOT GOING TO HAVE COLLOQUY HERE ON THIS. YOU CAN MAKE OF THAT WHATEVER YOU WANT.
THE RESPONDENT: OKAY. THEN I CAN PROVIDE MY TESTIMONY NOW IF THE COURT WOULD LIKE.
THE COURT: YES, PLEASE.
THE RESPONDENT: OKAY. SO THE TWO-MINUTE -- LESS-THAN-TWO-MINUTE TEXTING THAT VALDES REFERS TO -- I MEAN, I DON'T KNOW THIS WOMAN. I'VE NEVER SEEN HER IN PERSON. AND WE -- SHE INITIATED A MATCH WITH ME ON A DATING APP, AND WE TEXTED FOR LESS THAN TWO MINUTES. NOW, I PROVIDED TO THE COURT IN MY RESPONSE -- I THINK IT'S EXHIBIT E -- HOW I'VE BEEN THE VICTIM OF DEFAMATION AND ONLINE GANG STALKING AND CYBER-BULLYING SINCE AT LEAST 2015. YOU KNOW, I DON'T KNOW IF THIS IS THE -- MY FIRST COUPLE BOOKS THAT WERE PUBLISHED --
THE REPORTER: EXCUSE ME, YOUR HONOR. COULD HE

THE COURT: -- "REPRESENTATION" AT THE TOP.

THE PETITIONER: YES. SO WHOEVER SENT THIS MAIL SENT IT UNDER THE ASSUMPTION THAT IT WOULD BE POTENTIAL REPRESENTATION FOR US.

THE COURT: HOW DO YOU KNOW THAT THIS WAS A RESULT OF THE OTHER PARTY'S ACTIONS?

THE PETITIONER: WELL, IT'S CLEARLY A SUPPORTER OF HIS AND AN OPPONENT OF OURS, AND HE'S -- HE ALSO POSTED HIS OWN GOFUNDME AND HAS CALLED TO ACTION --

THE COURT: WHY IS IT CLEAR? WHY IS IT CLEAR?

THE PETITIONER: I'M SORRY. WHY IS WHAT CLEAR?

IN 2019, THE RESPONDENT, MR. MURREY, INITIATED A MATCH WITH ME ON A DATING APP. WHEN I RESPONDED AND MATCHED BACK WITH HIM, HE BEGAN TO IMMEDIATELY HARASS ME. I REPORTED THE HARASSMENT AND HIS ACCOUNT, AND I BLOCKED HIM.

THREE YEARS LATER, IN A FACEBOOK GROUP CALLED "ARE WE DATING THE SAME GUY?" A WOMAN HAD POSTED A QUESTION REGARDING MR. MURREY, AND I FELT IT WAS MY NEED IN THE INTEREST OF PUBLIC SAFETY TO SHARE MY STORY ALONG WITH ALL THE OTHER TESTIMONIALS. THOSE OTHER TESTIMONIALS, INCLUDING MS. SHARIAT'S, WAS -- IS NOT MY RESPONSIBILITY WHETHER IT WAS TRUE OR NOT. I READ IT. I FELT IT WAS, YOU KNOW, PRETTY COMPELLING, AND I FELT I NEEDED TO SHARE MY TRUTHFUL STORY, AND I DID.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT 25 HON. RICHARD BLOOM, JUDGE

-OOO-

VANESSA VALDES, PETITIONER/RESPONDENT, VS. STEWART LUCAS MURREY, RESPONDENT/PETITIONER.	NO. 24STRO02552
AND RELATED CASE NOS. 24STRO03710; 24STRO04181; 24STRO04183.	CERTIFIED TRANSCRIPT

REPORTER'S TRANSCRIPT OF PROCEEDINGS

THURSDAY, JULY 11, 2024

APPEARANCES:

FOR THE PETITIONER/ RESPONDENT: VANESSA VALDES
IN PROPRIA PERSONA

FOR THE RESPONDENT/ PETITIONER: STEWART LUCAS MURREY
IN PROPRIA PERSONA

ANGELICA ORSAT, CSR NO. 14385
OFFICIAL REPORTER

SESSIONS

	PAGE
THURSDAY, JULY 11, 2024	
A.M. SESSION	3

CASE NUMBER:	24STRO02552; 24STRO03710; 24STRO04181; 24STRO04183
CASE NAME:	VANESSA VALDES VS. STEWART LUCAS MURREY; AND RELATED CASES
LOS ANGELES, CALIFORNIA	THURSDAY, JULY 11, 2024
DEPARTMENT 25	HON. RICHARD BLOOM, JUDGE
REPORTER:	ANGELICA ORSAT, CSR NO. 14385
TIME:	A.M. SESSION

APPEARANCES:

PETITIONER/RESPONDENT, VANESSA VALDES, PRESENT IN COURT, IN PROPRIA PERSONA; RESPONDENT/PETITIONER, STEWART LUCAS MURREY, APPEARING VIA LACOURTCONNECT, IN PROPRIA PERSONA.

(THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT:)

THE COURT: ALL RIGHT. THE COURT AT THIS TIME WILL CALL FOUR RELATED MATTERS. WE HAVE NUMBER -- ON THE CALENDAR NO. 1, NO. 3, NO. 7, AND 8. LET ME GET DOWN TO THE SPECIFICS HERE.

NO. 1 IS VALDES VERSUS MURREY, 24STRO02552.

NO. 3 IS MURREY VERSUS VALDES, 24STRO03710.

NO. 7, 24STRO04181, MURREY VERSUS SHARIAT.

AND NO. 8 IS 24STRO04183, MURREY VERSUS GIBBONS.

I BELIEVE WE HAVE MS. VALDES AT THE COUNSEL

TABLE.

THE PETITIONER: YES. GOOD MORNING, YOUR HONOR.

THE COURT: STATE YOUR APPEARANCE, PLEASE.

THE PETITIONER: MY NAME IS VANESSA VALDES. I'M THE PETITIONER IN NO. 1.

THE COURT: THANK YOU.

AND STEWART MURREY ON COURTCONNECT?

THE RESPONDENT: YES, YOUR HONOR. I'M HERE FOR ALL FOUR CASES.

THE COURT: ALL RIGHT. CAN YOU TURN YOUR CAMERA ON, PLEASE?

THE RESPONDENT: OH, I DON'T HAVE THE CAMERA SET UP ON THIS COMPUTER. IT'S -- CAN I APPEAR JUST THROUGH THE TELEPHONE, IF THAT'S POSSIBLE?

THE COURT: CAN YOU WHAT?

THE RESPONDENT: CAN I JUST DO REMOTE CALL, IF THAT'S POSSIBLE? I DON'T HAVE A CAMERA ON THE DEVICE I'M USING RIGHT NOW.

THE COURT: WELL, YOU'RE SUPPOSED TO BE AVAILABLE ON CAMERA. I'LL ASK PETITIONER. IF SHE OBJECTS, THE COURT COULD CONSIDER PUTTING THIS MATTER OVER IN ORDER FOR YOU TO APPEAR PERSONALLY OR ON CAMERA. BUT AS YOU MIGHT IMAGINE --

THE RESPONDENT: YES, I'M HAPPY TO DO THAT.

THE COURT: BUT YOU HAVE TWO CASES HERE WITH MS. VALDES. ONE IS ONE THAT SHE BROUGHT, AND SO SHE HAS SOMETHING TO SAY ABOUT THIS AS WELL. BUT I APPRECIATE THAT YOU'RE OKAY WITH A CONTINUANCE. THE ISSUE FOR THE

COURT IS THAT IN ASSESSING CREDIBILITY AND DEMEANOR OF PARTIES AND WITNESSES, IT'S IMPORTANT TO BE ABLE TO LOOK AT PEOPLE AND --

THE RESPONDENT: I UNDERSTAND, YOUR HONOR. THAT MAKES SENSE.

THE COURT: BUT --

THE RESPONDENT: I WASN'T AWARE UNTIL TODAY --

THE COURT: SO LET ME ASK PETITIONER SINCE WE'RE ON THE TOPIC.

PETITIONER VALDES, HOW WOULD YOU LIKE THE COURT TO HANDLE THAT ISSUE?

THE PETITIONER: MR. MURREY IS A COMPLETE STRANGER TO ME. I'VE NEVER SEEN HIM IN PERSON. I WOULD LIKE TO SEE HIM, AND I WOULD LIKE HIM TO FACE ME IN THIS MATTER. HOWEVER, I WISH TO SETTLE THIS MATTER TODAY; SO IF HE CAN'T MAKE IT WORK, THEN I'M OKAY WITH IT.

THE COURT: ALL RIGHT. THANK YOU.

THE QUESTION IS SOMETHING THAT'S WITHIN THE COURT'S DISCRETION, IN ANY EVENT. THE COURT WILL ALLOW THE APPEARANCE TODAY BY TELEPHONE WITHOUT VIDEO.

NOW, WITH RESPECT TO THE MURREY VERSUS SHARIAT AND MURREY VERSUS GIBBONS MATTERS, THE COURT NOTES THAT NEITHER MATTER HAS BEEN SERVED AT THIS TIME UNLESS, PETITIONER MURREY, YOU HAVE A PROOF OF SERVICE THAT YOU HAVEN'T SHARED WITH THE COURT AT THIS TIME.

THE RESPONDENT: SO, YOUR HONOR -- AND I'M GLAD YOU RAISED THIS ISSUE BECAUSE I THINK ALL OF THESE CASES SHOULD BE HEARD TOGETHER AS THE COURT PROPERLY RELATED

THEM. MS. GIBBONS, THE SHERIFFS TRIED TO SERVE HER AND WAS UNABLE TO. THEREFORE, I FILED A REQUEST FOR CONTINUANCE.

THE COURT: DO YOU HAVE THE SHERIFF'S DECLARATION?

THE RESPONDENT: SO THAT WAS SUBMITTED TO THE COURT ON THE 8TH. THIS WAS WHEN I WAS IN COURT IN PERSON. I'M NOT -- PERHAPS THE COURT REMEMBERS, AND I HAD THE PRINTOUT FROM THE SHERIFF'S DEPARTMENT HAVING TRIED TO SERVE MS. GIBBONS, PROVING THE DUE DILIGENCE ON THAT. BUT THE COURT DECIDED TO MOVE THE HEARING TO TODAY TO CONSIDER THAT. THE COURT WAS WILLING TO CONTINUE IT AND --

THE COURT: GIVE ME -- GIVE ME A MOMENT, SIR.

THE RESPONDENT: SURE.

THE COURT: I SEE -- YOU SAY IT WAS ON JULY 8TH IT WAS FILED?

THE RESPONDENT: I BELIEVE SO, YES. WELL, IT WAS PRESENTED TO THE COURT DIRECTLY IN PERSON ON JULY 8TH. I TRIED TO FILE ONLINE THE PREVIOUS WEEK, BUT THERE WAS A -- I THINK -- PERHAPS FOR CIVIL ORDER -- CIVIL RESTRAINING ORDER, THE ONLINE FILING IS DIFFERENT. BUT IT BOUNCED, AND I BROUGHT PAPERS IN PERSON, AND I FILED THEM ON -- SAME DAY, ON THE 8TH.

THE COURT: OKAY, SIR. WE DO HAVE THAT DOCUMENT, BUT THE -- HERE WE GO.

SO THERE IS ONE DECLARATION, AND THAT'S IN THE MATTER OF GIBBONS.

THE RESPONDENT: GIBBONS. YES, SIR.

THE COURT: ALL RIGHT. LET'S REFOCUS OUR ATTENTION FOR A MOMENT ON SHARIAT.

THE RESPONDENT: YES.

THE COURT: IS THERE A DECLARATION OF DUE DILIGENCE IN THAT MATTER?

THE RESPONDENT: THERE IS. HOWEVER, IT'S NOT FROM THE SHERIFF. JUST 10 SECONDS OF BACKGROUND. SHARIAT AND ALL OF THESE CASES HAVE BEEN RELATED BECAUSE SHARIAT DEVELOPED A FICTIONAL STORY OF ME STALKING HER AT HOTELS. AND --

THE COURT: YOU DON'T NEED TO REPEAT YOUR EVIDENCE AT THIS TIME. WE'RE FOCUSED ON THE SERVICE OF PROCESS.

THE RESPONDENT: RIGHT. RIGHT. SO THIS IS RELEVANT BECAUSE THIS IS A PERSON THAT I DO NOT KNOW, AND I HAVE NEVER MET THIS PERSON IN MY LIFE. AND SO I'M CURRENTLY SUING HER IN ANOTHER CASE FOR DEFAMATION. AND IN THAT CASE, I DID HAVE HER -- SHARIAT SERVED PERSONALLY WITH A PROCESS SERVER, BUT HER MOTION TO QUASH WAS GRANTED EVEN THOUGH THEY TRIED TO SERVE --

THE COURT: YOU'RE TALKING ABOUT ANOTHER CASE. YOU'RE TALKING ABOUT ANOTHER CASE; CORRECT?

THE RESPONDENT: IT'S RELEVANT BECAUSE THE ONLY ADDRESS I HAVE FOR SHARIAT NOW, SINCE SHE'S ELUDING SERVICE, IS A P.O. BOX THAT THE SHERIFFS REFUSED TO GO AND SERVE. SO WHAT I DID IS I DROVE OUT THERE WITH A FRIEND, READY TO SERVE HER, KIND OF LIKE A STAKEOUT SITUATION, BUT THE P.O. BOX THAT SHARIAT IS USING IN ARCADIA IS CLEARLY ANOTHER ATTEMPT TO EVADE SERVICE.

SO WHAT I DID IS I FILED EVIDENCE TO THE COURT SHOWING THAT MS. SHARIAT HAS RECENTLY FILED COURT DOCUMENTS PROVIDING BOTH THE ARCADIA P.O. BOX AS A MAILING ADDRESS AND A CURRENT RECENT EMAIL ADDRESS WHERE SHE'S RECEIVING PUBLIC -- WHERE SHE'S RECEIVING LEGAL PAPERS. AND SO ALONG WITH GIBBONS, I THINK THE SOLUTION HERE IS ALTERNATIVE SERVICE THROUGH EMAIL AND CERTIFIED MAIL, AND THEN WE CAN GET ALL THESE CASES TOGETHER AND GO FORWARD AND DEAL WITH THE EVIDENTIARY PHASE.

THE COURT: WELL, THE COURT'S NOT GOING TO DO THAT AT THIS TIME. THE COURT'S GOING TO REQUIRE YOU TO MAKE ADDITIONAL EFFORTS TO SERVE. IN FACT, THE DECLARATION FROM THE SHERIFF'S DEPARTMENT IN THE GIBBONS CASE ACTUALLY STATES POSSIBLE PERSONAL OR PRIVATE SERVICE NEEDED. SO YOU CAN -- YOU CAN MAKE A DIFFERENT -- ADDITIONAL EFFORTS TO SERVE EITHER AT THE 2121 CRENSHAW BOULEVARD ADDRESS, OR IF YOU HAVE OTHER ADDRESS OR LOCATION INFORMATION, YOU CAN TRY THAT AT THIS TIME.

BUT WHAT HAVE YOU DONE --

THE RESPONDENT: I WOULD BE HAPPY TO DO MORE DUE DILIGENCE.

THE COURT: JUST GIVE ME A SECOND.

THE RESPONDENT: SURE.

THE COURT: ALL RIGHT. SO THE DECLARATION IN THE GIBBONS CASE WAS ISSUED BY THE SHERIFF'S DEPARTMENT ON JULY 8TH. THAT WAS PROBABLY AT THE REQUEST OF THE COURT OR AT THE SUGGESTION OF THE COURT THAT YOU RETRIEVE A DOCUMENT FROM THE SHERIFF'S DEPARTMENT.

THE RESPONDENT: IT WAS, YOUR HONOR.

WITH MS. SHARIAT, I'M HAPPY TO PAY A PROCESS SERVER TO DO ANOTHER STAKEOUT AT THE P.O. BOX. I THINK, REALISTICALLY, THE REASON I HAD TO FILE SEVERAL EXHIBITS WITH SHOWING HER AGGRESSIVE AND HOSTILE ATTEMPTS TO ELUDE SERVICE AND EVADE SERVICE WAS IN THE HOPES THAT ALTERNATIVE SERVICE WOULD BE GRANTED. THE COURT DID GRANT MS. VALDES ALTERNATIVE SERVICE TO SERVE ME BY EMAIL; SO I THINK IT'S ONLY FAIR AND JUST IN THIS CASE IF THE OTHER -- IF EVERYONE INVOLVED IS RECEIVING EMAIL, AS MOST PEOPLE DO THESE DAYS, AND, ALSO, THERE'S PUBLIC COURT RECORDS OF RECENT EMAIL ADDRESSES FOR EVERYONE INVOLVED IN THESE MATTERS.

THE COURT: THE COURT WILL CONTINUE THE SHARIAT AND THE GIBBONS MATTER TO ALLOW FOR SERVICE -- ADDITIONAL ATTEMPTS AT SERVICE OF PROCESS IN EACH MATTER.

THE RESPONDENT: DOES THE COURT REQUIRE THE SHERIFF TO RETURN TO THE GIBBONS ADDRESS OR SOMEHOW --

THE COURT: THE COURT'S -- THE COURT'S NOT MAKING ANY REQUIREMENT ON THAT OTHER THAN THAT PAPERS BE SERVED PURSUANT TO CALIFORNIA LAW --

THE RESPONDENT: OKAY.

THE COURT: -- PERSONALLY SERVED.

THE COURT'S NOT MAKING ANY ADDITIONAL ORDERS AT THIS TIME. PARTICULARLY, THE COURT IS NOT MAKING AN ORDER FOR ALTERNATIVE SERVICE AT THIS TIME. COURT WOULD LIKE TO SEE THESE DOCUMENTS PERSONALLY SERVED.

THE RESPONDENT: I UNDERSTAND, YOUR HONOR. I WILL

DO THE DUE DILIGENCE NECESSARY FOR THAT.

NOW, THE ISSUE WITH VALDES WOULD BE -- THERE ARE TWO THINGS. ONE IS THAT THEY SHOULD ALL BE HEARD TOGETHER.

THE COURT: WAIT. WE'RE NOT ON VALDES RIGHT NOW.

THE RESPONDENT: OKAY.

THE COURT: THE COURT IS -- IF THERE'S A REQUEST FOR A CONTINUANCE IN VALDES, I'LL HEAR THAT IN A MOMENT. BUT THE COURT IS NOT CONTINUING --

THE RESPONDENT: I UNDERSTAND, YOUR HONOR.

THE COURT: -- THE VALDES DUELING RESTRAINING ORDER REQUEST AT THIS TIME. WE'LL ADDRESS THAT IN A MOMENT.

THE CLERK: AUGUST 8TH AT 8:30.

THE RESPONDENT: I UNDERSTAND.

THE COURT: ALL RIGHT. WILL YOU WAIVE TIME SO THAT WE CAN SET THIS ON AUGUST 8TH AT 8:30 A.M. IN THIS DEPARTMENT?

THE RESPONDENT: YES, YOUR HONOR.

THAT WOULD BE FOR GIBBONS AND SHARIAT; IS THAT CORRECT?

THE COURT: THAT'S CORRECT.

THE RESPONDENT: OKAY.

THE COURT: ALL RIGHT. THIS MATTER IS CONTINUED TO AUGUST 8TH AT 8:30 A.M. IN THIS DEPARTMENT. THIS IS A ONE-TIME CONTINUANCE ONLY. IN THE ABSENCE OF A SHOWING OF DUE DILIGENCE OR GOOD CAUSE AT THE AUGUST 8TH HEARING DATE, THE COURT MAY CHOOSE TO DISMISS THESE MATTERS -- ONE OR BOTH OF THESE MATTERS WITHOUT PREJUDICE. SO IT IS

THE INTENTION OF THE COURT THAT THERE BE NO FURTHER CONTINUANCES.

ALL RIGHT. SO THAT TAKES CARE OF SHARIAT AND GIBBONS.

THE RESPONDENT: YES, YOUR HONOR. AND I WILL FILE A -- THE PROPER PAPERS REQUESTING ALTERNATIVE SERVICE IF I CAN PROVIDE THE COURT WITH THE EVIDENCE OF DILIGENCE FOR SHARIAT.

THE COURT: THE COURT MAKES NO COMMENT ON WHAT YOU JUST SAID. COURT'S NOT GRANTING PERMISSION. THE COURT HASN'T MADE AN ORDER, IN ANY WAY, WITH RESPECT TO ALTERNATIVE SERVICE.

THE RESPONDENT: I UNDERSTAND, YOUR HONOR.

THE COURT: ALL RIGHT. SO THAT LEAVES US WITH NUMBERS 1 AND 3.

PETITIONER AND RESPONDENT VALDES WISHES TO MOVE FORWARD TODAY.

ARE YOU PREPARED TO MOVE FORWARD TODAY?

THE PETITIONER: I AM, YOUR HONOR. THANK YOU.

THE COURT: AND, PETITIONER AND RESPONDENT MURREY, ARE YOU PREPARED TO MOVE FORWARD?

THE RESPONDENT: I AM NOT. I AM NOT PREPARED TO MOVE FORWARD BECAUSE I BELIEVE THAT THIS CASE CAN ONLY BE HEARD WITH THE RELATED CASES THAT WE JUST DISCUSSED. AND, FURTHERMORE, BECAUSE THIS IS A DUELING RESTRAINING ORDER, AS THE COURT MENTIONED A SECOND AGO, VALDES'S RESPONSE TO MY RESTRAINING ORDER AGAINST HER HAS SOMETHING LIKE 40 PERCENT OF IT UNINTELLIGIBLE,

UNREADABLE PAGES. SO I CAN ONLY DO WHAT I'M RESPONDING TO, BECAUSE VALDES'S FILING CANNOT BE -- I THINK THERE WAS AN ERROR WITH HER ONLINE DIGITAL FILING. EIGHT OR NINE PAGES SIMPLY JUST SHOW UP AS BLANK. AND SO FOR THOSE TWO REASONS, I THINK IT -- IN THE INTEREST OF JUSTICE, THESE ARE ALL --

THE COURT: THAT IS THE DOCUMENT -- THAT'S THE DOCUMENT THAT WAS FILED ON JULY 3RD?

THE RESPONDENT: I'M NOT SURE WHEN VALDES FILED IT. I THINK SHE MISLABELED IT AS "OPPOSITION" WHEN IT WAS SUPPOSED TO BE LABELED A RESPONSE.

THE COURT: WELL, I'M LOOKING AT A DOCUMENT -- LET ME MAKE SURE I'M IN THE RIGHT -- OH, THIS IS THE RESPONSE THAT YOU FILED. I SEE THERE WAS A RESPONSE, AND THEN THERE WAS A RESPONSE TO THE RESPONSE.

THE RESPONDENT: THAT'S TRUE, YOUR HONOR. BUT I THINK IT WAS HER RESPONSE ERRONEOUSLY LABELED "OPPOSITION" -- THE DOCUMENT I'M TALKING ABOUT. AND I MENTIONED IN MY RESPONSE THE RESPONSE IS VERY BROAD.

THE COURT: FILED ON JUNE 26TH.

THE RESPONDENT: SOUNDS ABOUT RIGHT.

THE COURT: IT IS TRUE THAT PAGES 15 THROUGH 23, AT LEAST OF THE COURT RECORD, ARE BLANK.

LET ME ASK, MS. VALDES, YOU ARE PREPARED TO MOVE FORWARD TODAY. ARE YOU INTENDING TO -- HOW LONG DO YOU BELIEVE IT WILL TAKE TO PRESENT YOUR SIDE OF THIS CASE?

THE PETITIONER: NOT VERY LONG, YOUR HONOR. IT'S

VERY SIMPLE. I CAN RESPOND. THE BLANK PAGES, I THINK, ARE IRRELEVANT. I CAN RESPOND HERE TODAY.

THE COURT: WELL, THEY WON'T BE CONSIDERED SINCE THEY'RE NOT PART OF THE RECORD.

THE PETITIONER: OKAY.

THE COURT: AND, MR. MURREY, HOW LONG WILL IT TAKE YOU TO PUT YOUR CASE ON?

THE RESPONDENT: WELL, IT WOULD TAKE EVEN LONGER BECAUSE I HAVE TO DO IT IN THE CONTEXT OF BRINGING UP THE ISSUES THAT GO TO THE EXACT SAME HEART OF THE MATTER WITH SHARIAT AND GIBBONS. AND WITHOUT BEING ABLE TO HAVE THEM PRESENT AND HAVE THEM SPEAK UNDER OATH AND, YOU KNOW, DEAL WITH THE EVIDENTIARY PROBLEMS, IT WOULD BE EVEN LONGER.

AND I TAKE THIS CASE VERY SERIOUS BECAUSE I -- YOU KNOW, I HAVE MYSELF RECEIVED A DEATH THREAT, AND I ALSO, AT THE SAME TIME, BELIEVE IN FREE SPEECH AND DO NOT WANT PEOPLE'S SPEECH TO BE NARROWED, ESPECIALLY IF THIS IS JUST AN ISSUE WITH PUBLIC DOCUMENTS.

THE COURT: WHERE IN -- WHERE IN YOUR MOVING PAPERS, SIR, DO YOU REFER TO SHARIAT OR GIBBONS?

THE RESPONDENT: IN PRACTICALLY EVERY PAGE. SO ARE YOU TALKING ABOUT MY ORIGINAL RESTRAINING ORDER?

THE COURT: I'M LOOKING -- I'M LOOKING AT YOUR PETITION. WHAT PAGE OF YOUR PETITION?

THE RESPONDENT: OKAY. I'M SWITCHING OVER TO THAT DOCUMENT RIGHT NOW. JUST ONE SECOND. AND THIS IS -- YOU'RE REFERRING TO MY PETITION VERSUS VALDES, NOT --

THE COURT: CORRECT.

THE RESPONDENT: -- MY RESPONSE TO -- BECAUSE IT'S ALSO IN MY RESPONSE.

SO IN MY ATTACHMENT, "DESCRIBE HARASSMENT," AND IN MY FURTHER ATTACHMENT, "DESCRIBE PREVIOUS HARASSMENT," IT'S LITERALLY EVERY PAGE WHERE BOTH GIBBONS AND SHARIAT ARE MENTIONED.

THE COURT: WHAT SPECIFIC PAGE SO THAT CAN I SEE IT?

THE RESPONDENT: SURE. SURE.

THE COURT: IT DOESN'T HELP TO SAY, "LITERALLY EVERY PAGE."

THE RESPONDENT: OKAY. I UNDERSTAND YOU'RE LOOKING FOR IT. SO ON THE FIRST PAGE OF MY ATTACHMENT 7(A)(3), "DESCRIBE HARASSMENT," IT SAYS, "BACKGROUND INTRODUCTION AND DEATH THREATS BY VALDES." SO -- AND JUST UNDERNEATH THAT, ON THE SAME PAGE -- THIS IS PAGE 1 OF THAT ATTACHMENT -- IT SAYS, UNDER THE TITLE, "VALDES'S FRAUDULENT AND HARASSING GOFUNDME WEB PAGE ARE DIRECTED AT PETITIONER WITH" --

SO IN THAT PARAGRAPH -- IT FOLLOWS RIGHT UNDERNEATH THAT BOLD HEADING -- IT TALKS ABOUT VALDES CONSPIRING TO PUBLISH THIS DOCUMENT THAT WAS INCITING THE DEATH THREATS -- THAT'S MY LANGUAGE -- ALLEGING THAT PETITIONER STALKED AND HARASSED SOMEONE NAMED ELLY SHARIAT. EXHIBIT 3, ATTACHED DOCUMENT. AND THEN IT GOES ON --

THE COURT: I SEE.

THE RESPONDENT: -- THAT GIBBONS --

YES. AND --

THE COURT: I SEE. YOU --

THE RESPONDENT: -- GIBBONS --

THE COURT: YOU DO MAKE REFERENCE TO BOTH OF THE INDIVIDUALS. DID YOU SUBPOENA EITHER OF THEM?

THE RESPONDENT: YES, I DID. I -- WELL, I'M SORRY. MY DEFAMATION CASE IS MOVING FORWARD --

THE REPORTER: EXCUSE ME, YOUR HONOR. CAN HE PLEASE SLOW DOWN?

THE COURT: YEAH, YOU'RE GOING TO NEED TO -- YOU NEED TO SLOW DOWN, SIR. THE COURT REPORTER CAN'T TAKE DOWN EVERYTHING YOU'RE SAYING.

THE RESPONDENT: SORRY, YOUR HONOR. EXCUSE ME.

THE COURT: MY QUESTION WAS VERY -- MY QUESTION WAS VERY SIMPLE. IN THIS CASE, DID YOU SUBPOENA EITHER OF THOSE INDIVIDUALS?

THE RESPONDENT: OH, I SEE WHAT YOU'RE ASKING. I HAVE NOT BEEN ABLE TO BECAUSE I HAVE PREPARED NOTICES -- I HAVE PREPARED SUBPOENAS. HOWEVER, BECAUSE I ALSO HAVE CASES AGAINST THEM INDIVIDUALLY, I WOULD HAVE PREPARED AND ALSO SERVED VALDES NOTICES IN LIEU OF SUBPOENA AND REQUEST FOR DOCUMENTS. AS THE COURT IS AWARE, I HAVEN'T BEEN ABLE TO SERVE SHARIAT AND GIBBONS. AND SO SERVING THEM SUBPOENAS IS ALSO QUITE DIFFICULT AT THIS TIME.

THE PETITIONER: YOUR HONOR --

THE COURT: YES --

THE PETITIONER: -- IF I MAY?

THE COURT: -- MS. VALDES?

THE PETITIONER: I HAVE DONE EVERYTHING. I PROVIDED DUE DILIGENCE. I'M HERE. I'M READY TO PRESENT MY SIDE. I CAN RESPOND TO EVERYTHING HE'S TALKING ABOUT. I AM NOT RELATED TO THOSE OTHER CASES. HE LOOPED ME IN IN A GROUPED CIVIL LAWSUIT THAT WAS BASELESS, AND I ACTUALLY WON MY ANTI-SLAPP AGAINST HIM. SO I WOULD LIKE TO MOVE FORWARD WITH MY CASE WITH HIM AND RESPOND TO HIS RESTRAINING ORDER AGAINST ME AND JUST MOVE FORWARD WITH THIS TODAY, PLEASE.

THE COURT: ALL RIGHT.

THE RESPONDENT: THAT'S ACTUALLY WRONG.

THE COURT: GO AHEAD. I'LL GIVE YOU THE FINAL WORD, SIR, BUT KEEP IT BRIEF.

THE RESPONDENT: THANK YOU.

MS. VALDES JUST LIED TO THE COURT, BECAUSE SHE HAS A GOFUNDME WEB PAGE WITH HER NAME ALONGSIDE MS. GIBBONS AND MS. SHARIAT RIGHT NEXT TO EACH OTHER. SO SHE IS WORKING WITH THEM AND CONSPIRING WITH THEM. I THINK I EVEN SUBMITTED THAT AS AN EXHIBIT. I CAN FIND IT RIGHT NOW FOR THE COURT IF THE COURT WOULD LIKE TO -- PROVIDE VALDES'S GOFUNDME WEB PAGE ALONGSIDE GIBBONS AND SHARIAT AND LOOK --

THE COURT: I'M --

THE RESPONDENT: UH-HUH.

THE COURT: THE COURT REALLY FEELS IT'S APPROPRIATE TO GO FORWARD WITH THE CASES THAT ARE HERE BEFORE THE COURT TODAY IN NUMBERS 1 AND 3, VALDES VERSUS MURREY AND

MURREY VERSUS VALDES. THIS IS THE SECOND APPEARANCE, I BELIEVE --

THE PETITIONER: YES.

THE COURT: -- FOR -- FOR THESE MATTERS. THEY ARE AND SHOULD BE --

THE RESPONDENT: YEAH.

THE COURT: -- IN ANY EVENT --

DON'T INTERRUPT, PLEASE.

THE RESPONDENT: MAY I -- UH-HUH.

THE COURT: THE --

THE RESPONDENT: MAY I --

THE COURT: -- THE MATTERS WERE FILED. ONE WAS FILED APRIL 12TH, AND PETITIONER IN THAT MATTER IS EXPECTED TO BE READY TO MOVE FORWARD. AND MURREY VERSUS VALDES WAS FILED ON MAY 28TH.

THE RESPONDENT: MAY I ADD ONE THING, YOUR HONOR?

THE COURT: VERY BRIEFLY.

THE RESPONDENT: THE ONLY REASON THAT THIS CASE EVEN HAS THE POTENTIAL TO GO FORWARD IS BECAUSE, IN GOOD FAITH, I HAVE ACCEPTED ALTERNATIVE SERVICE, AND THIS COURT GRANTED MS. VALDES ALTERNATIVE SERVICE. SO IT SEEMS ONLY FAIR AND JUST FOR THE COURT TO GRANT ME THE OPTION. AND THIS COURT ALSO PROPERLY RELATED ALL THESE CASES TO EACH OTHER, AND MY PAGES ARE REPLETE WITH REFERENCES TO HOW VALDES IS INSEPARABLE FROM GIBBONS AND SHARIAT. VALDES HERSELF EVEN USES EVIDENCE OF SHARIAT'S FICTIONAL STORY TO SUPPORT HER RESTRAINING ORDER PETITION --

THE COURT: YES. BUT THE --

THE RESPONDENT: -- AND TO RESPOND TO MY RESTRAINING ORDER.

THE COURT: -- THE OTHER CASES HAVE NOT BEEN SERVED AT THIS TIME. AND THE COURT ALWAYS RESERVES ITS OWN -- ITS DISCRETION WHEN IT PUTS CASES TOGETHER BY RELATING THEM IN ORDER TO IMPROVE THE EFFICIENCY AND THE EFFICIENT OPERATION OF THE COURT. IT RESERVES THE JURISDICTION TO -- WE DON'T NEED TO UNRELATE THEM, BUT TO DEAL WITH THEM AS IS APPROPRIATE.

THEY HAVE NOT BEEN SERVED AT THIS TIME, AND THERE'S NO TELLING WHEN THEY MIGHT BE SERVED. AND IT SEEMS MANIFESTLY UNFAIR THAT ONE CASE SHOULD NOT GO FORWARD AND THE -- WHILE THE OTHERS ARE WAITING FOR SERVICE OF PROCESS. THOSE ARE BOTH YOUR CASES. YOU HOLD, TO A CERTAIN DEGREE, WITHIN YOUR CONTROL AS TO WHETHER THOSE MATTERS GET SERVED OR NOT. BUT THEY'RE ON THEIR OWN TRACK. THEY'RE SEPARATE CASES, AND THEIR FACTS WILL BE HEARD AT SUCH TIME AS IT'S APPROPRIATE TO HEAR THEM.

IN THE MEANTIME, WE WILL GO FORWARD TODAY WITH VALDES VERSUS MURREY AND MURREY VERSUS VALDES, CASES NO. 1 AND 3 ON TODAY'S CALENDAR.

I NOTE THAT -- I ALREADY PREVIOUSLY NOTED THAT VALDES FILED HER CASE FIRST; SO SHE'LL PRESENT HER EVIDENCE FIRST. I THINK WE CAN PROBABLY COMBINE THE EVIDENCE FOR AND AGAINST IN EACH OF THESE MATTERS, BUT THE COURT WILL HEAR FIRST FROM VANESSA VALDES.

YOU HAVE NOT BEEN SWORN AT THIS TIME; SO I'M GOING TO ASK YOU BOTH TO RAISE YOUR RIGHT HANDS AND BE SWORN.

THE CLERK: DO YOU AND EACH OF YOU SOLEMNLY STATE UNDER PENALTY OF PERJURY THAT THE TESTIMONY YOU MAY GIVE IN THE CAUSE NOW PENDING BEFORE THIS COURT SHALL BE THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH?

THE PETITIONER: I DO.

THE CLERK: THANK YOU.

IF YOU CAN EACH STATE YOUR NAME FOR THE RECORD.

THE PETITIONER: VANESSA VALDES.

THE CLERK: WE DIDN'T GET A RESPONSE FROM RESPONDENT.

THE RESPONDENT: I DO.

DR. STEWART LUCAS MURREY.

THE CLERK: THANK YOU.

YOU MAY BE SEATED.

THE COURT: ALL RIGHT. SO, MS. VALDES, YOU MAY PROCEED TO PROVIDE YOUR TESTIMONY TO THE COURT AT THIS TIME AS TO WHY YOU BELIEVE CIVIL HARASSMENT RESTRAINING ORDERS ARE APPROPRIATE IN THIS CASE. THE BURDEN THAT EACH OF YOU HAVE IN THIS MATTER IS TO SHOW BY CLEAR AND CONVINCING EVIDENCE. IT IS A HIGH BURDEN. IT IS WELL BEYOND PREPONDERANCE OF THE EVIDENCE THAT EXISTS FOR MOST OF OUR OTHER RESTRAINING ORDER CONTEXTS LIKE DOMESTIC VIOLENCE. SO PLEASE PROCEED.

THE PETITIONER: THANK YOU, YOUR HONOR.

IN 2019, THE RESPONDENT, MR. MURREY, INITIATED A MATCH WITH ME ON A DATING APP. WHEN I RESPONDED AND MATCHED BACK WITH HIM, HE BEGAN TO IMMEDIATELY HARASS ME. I REPORTED THE HARASSMENT AND HIS ACCOUNT, AND I BLOCKED HIM.

THREE YEARS LATER, IN A FACEBOOK GROUP CALLED "ARE WE DATING THE SAME GUY?" A WOMAN HAD POSTED A QUESTION REGARDING MR. MURREY, AND I FELT IT WAS MY NEED IN THE INTEREST OF PUBLIC SAFETY TO SHARE MY STORY ALONG WITH ALL THE OTHER TESTIMONIALS. THOSE OTHER TESTIMONIALS, INCLUDING MS. SHARIAT'S, WAS -- IS NOT MY RESPONSIBILITY WHETHER IT WAS TRUE OR NOT. I READ IT. I FELT IT WAS, YOU KNOW, PRETTY COMPELLING, AND I FELT I NEEDED TO SHARE MY TRUTHFUL STORY, AND I DID.

MR. MURREY DID NOT LIKE THOSE THINGS THAT WERE POSTED ABOUT HIM, EVEN THOUGH THEY WERE HONEST ON MY PART, AND HAS SINCE USED THE LEGAL SYSTEM TO FURTHER HARASS ME AND, UNDER THE GUISE OF THE LAW, FIND MY HOME ADDRESS, COME TO MY HOME AFTER 10:00 P.M. TO SERVE ME, AND CONTINUE ON WITH HARASSING MOTIONS, PROLONGING OUR CASE FROM DECEMBER UNTIL APRIL WHEN IT WAS DISMISSED BASED ON MY MOTION TO STRIKE.

THE COURT: SO LET ME INTERRUPT YOU. YOU ARE PROVIDING A SUMMARY OF FACTS --

THE PETITIONER: YES.

THE COURT: -- BUT NOT TOO MANY FACTS.

THE PETITIONER: SO I'LL GO AHEAD.

SO AFTER IT WAS DISMISSED ON APRIL 8TH, ON

APRIL 11TH, HE BEGAN POSTING IMAGES OF MY -- MY ANTI-SLAPP MOTION THAT CONTAINED MY HOME ADDRESS, MY PHONE NUMBER, MY WORK EMAIL ADDRESS, I BELIEVE, MY EMAIL ADDRESS, AND -- ON HIS PERSONAL PUBLIC BLOCKCHAIN WEBSITES. IT IS MY UNDERSTANDING THAT BLOCKCHAIN WEBSITES, WHEN SOMETHING IS PUBLISHED, CANNOT BE DELETED. SO IT WILL ALWAYS HAVE A TRACE OF THAT INFORMATION OUT THERE. I HAVE SINCE HAD TO RAMP UP HOME SECURITY. I HAVE BEEN INCREDIBLY STRESSED AND PARANOID AT HOME. HE CONTINUES TO HARASS ME THROUGH THE LEGAL SYSTEM AND THROUGH HIS POSTS ONLINE.

THE COURT: HOW SO? HOW SO HAS HE CONTINUED TO HARASS YOU? AGAIN, WHEN YOU SAY, "HE'S HARASSED ME THROUGH THE LEGAL SYSTEM" --

THE PETITIONER: YES.

THE COURT: -- IT IS MORE -- THAT'S MORE SUMMARY IN NATURE. IT DOESN'T REALLY GIVE THE COURT FACTS TO RELY ON.

THE PETITIONER: IN HIS -- IN HIS MOTIONS AND HIS CASES AGAINST ME, HE MAKES FALSE CLAIMS ABOUT MY ACTIONS, MY WORDS. HE HAS NO EVIDENCE TO BACK IT UP. AND IN HIS PUBLIC POSTINGS, HE ALSO MAKES FALSE CLAIMS ALLUDING TO MY ALLEGED AFFILIATION WITH JEFFREY EPSTEIN, GHISLAINE MAXWELL, THE ITALIAN MOB, THE ISRAELI GOVERNMENT, AND THE CIA.

THE COURT: HOW DOES HE DO THAT?

THE PETITIONER: I'M SORRY?

THE COURT: HOW DOES HE DO THAT?

THE PETITIONER: IN EXHIBIT C, THERE IS --

THE COURT: YOUR EXHIBIT C?

THE PETITIONER: YES.

THE COURT: ONE MOMENT.

THE PETITIONER: RESEARCHGATE.NET.

THE COURT: YOU SAID EXHIBIT C?

THE PETITIONER: YES, THAT'S CORRECT.

THE COURT: WHICH PAGE OF EXHIBIT C?

THE PETITIONER: ON THE VERY LAST PAGE, HE LISTS WOMEN HE -- HE'S ALLUDING TO -- OR, YOU KNOW, PEOPLE HE'S ALLUDING TO THESE CONSPIRACY THEORIES, AND MY NAME IS CIRCLED. I'M NOT SURE IF IT'S CIRCLED IN YOUR DOCUMENT.

THE COURT: IT IS.

THE PETITIONER: OKAY. SO IN THE PAGES PRIOR TO THAT -- I'D LIKE TO HIGHLIGHT THAT THIS ARTICLE IS TITLED, "ARE WE BEING MURDERED BY THE SAME INTELLIGENCE MAFIA FROM EPSTEIN'S PEDOPHILE NETWORK TO FACEBOOK, UNITED STATES, AND ISRAELI CYBER CRIMINALS?"

THE COURT: I DON'T UNDERSTAND WHAT THAT MEANS, BUT MAYBE I DON'T NEED TO.

THE PETITIONER: RESPECTFULLY, I DON'T EITHER.

IN THIS ARTICLE THAT HE HAS LISTED MY NAME SIDE BY SIDE WITH THESE OTHER INDIVIDUALS I DON'T KNOW -- OR IF I DO KNOW THEM, IT'S BECAUSE OF THE CASE THAT HE BROUGHT AGAINST ME, LOOPING ME IN WITH THEM -- HE -- HE IMPLIES THAT WE ARE PART OF THESE CONSPIRACY THEORIES. NOW, WHEN HE POSTS THESE ONLINE ASIDE -- SIDE BY SIDE WITH MY HOME ADDRESS, MY PHONE NUMBER, MY FACE, MY

COLLEAGUES' FACES, IT BRINGS ME A LOT OF STRESS AND ANXIETY THAT PEOPLE NOW KNOW WHERE I LIVE, AND THEY MAY THINK THAT THESE ALLEGATIONS ARE TRUE WHEN THEY'RE OUTRAGEOUS AND INDECENT AND VERY FALSE.

THE COURT: GO AHEAD.

THE PETITIONER: HE -- I'M SORRY. SINCE -- SINCE HIS OUTRAGEOUS SLAPP LAWSUIT AGAINST ME, SOME OF MY CO-DEFENDANTS AND I DID COME TOGETHER TO FIGURE OUT HOW TO NAVIGATE THIS TOGETHER. OUR CASES ARE NOT AFFILIATED WITH EACH OTHER IN ANY WAY, BUT WE WERE STILL INVOLVED IN THE SAME CASE NUMBER. SO WE DID CREATE A GOFUNDME AND ALSO AN EMAIL ADDRESS TIED TO THAT GOFUNDME FOR ANY REPRESENTATION THAT WOULD HELP US.

AND IN THAT EMAIL ADDRESS, WE DID RECEIVE SOME HATE MAIL IF -- THAT IS EXHIBIT E -- DUE TO MURREY'S INFLAMMATORY LANGUAGE AND FALSE ACCUSATIONS ABOUT US. THIS WAS THE MAIL WE RECEIVED.

THE COURT: ALL RIGHT. I'M LOOKING AT EXHIBIT E.

THE PETITIONER: WOULD YOU LIKE ME TO READ THAT ALOUD FOR THE COURT? IT'S PRETTY EXPLICIT. IT'S VULGAR.

THE COURT: WELL, I'M NOT SURE WHICH PAGE YOU'RE ASKING THE COURT TO LOOK AT, FIRST OF ALL. THE FIRST PAGE?

THE PETITIONER: I ONLY HAVE ONE EXHIBIT [SIC] FOR EXHIBIT E. IT IS --

THE COURT: OH, INDEED. I SEE. IT'S ONE PAGE. IT SAYS --

THE PETITIONER: YES.

THE COURT: -- "REPRESENTATION" AT THE TOP.

THE PETITIONER: YES. SO WHOEVER SENT THIS MAIL SENT IT UNDER THE ASSUMPTION THAT IT WOULD BE POTENTIAL REPRESENTATION FOR US.

THE COURT: HOW DO YOU KNOW THAT THIS WAS A RESULT OF THE OTHER PARTY'S ACTIONS?

THE PETITIONER: WELL, IT'S CLEARLY A SUPPORTER OF HIS AND AN OPPONENT OF OURS, AND HE'S -- HE ALSO POSTED HIS OWN GOFUNDME AND HAS CALLED TO ACTION --

THE COURT: WHY IS IT CLEAR? WHY IS IT CLEAR?

THE PETITIONER: I'M SORRY. WHY IS WHAT CLEAR?

THE COURT: YOU SAID IT'S "CLEARLY" --

THE PETITIONER: OH, BECAUSE OF THE NATURE OF THE LANGUAGE. IT SOUNDS LIKE HE'S ROOTING FOR MURREY AND ROOTING AGAINST US, CONSIDERING THE SECOND PART OF THAT EMAIL.

THE COURT: GO AHEAD.

THE PETITIONER: MR. MURREY ALSO CREATED HIS OWN GOFUNDME AND HAS POSTED ON HIS WEBSITES CALLING FOR ACTION FROM HIS SUPPORTERS TO REACH OUT, YOU KNOW, LET -- HE SAYS, "LET ME KNOW YOUR THOUGHTS. WE NEED TO RISE UP AGAINST THIS INJUSTICE." ON HIS INSTAGRAM, HE POSTS THINGS THAT SAY, "ALL OF MY DEFENDANTS ARE PRO-ISRAEL STATE VIOLENT PSYCHOPATHS." AGAIN, COMPLETELY FALSE AND HYSTERICAL AND INFLAMMATORY, AND I REALLY DO FEAR FOR MY SAFETY BECAUSE MY HOME ADDRESS IS NOW POSTED ON THOSE BLOCKCHAIN WEBSITES OF MURREY'S.

THE COURT: HOW IS HIS BEHAVIOR DIFFERENT FROM

YOURS IN ATTEMPTING TO MAKE PUBLIC HIS ACTIONS THAT YOU FOUND OFFENSIVE?

THE PETITIONER: WELL, MINE WERE TRUE, AS WAS FOUND BY THE COURT, BY HONORABLE KEOSIAN -- JUDGE KEOSIAN. EVERYTHING THAT I HAVE STATED ONLINE WAS FACTUAL INFORMATION WITH IMAGES OF THE HARASSMENT THAT HE BROUGHT AGAINST ME DURING OUR HINGE CONVERSATION. I GAVE MY OPINION THAT HE SHOULD NOT BE ON DATING APPS, AND I HAVE NOT POSTED ANYTHING ABOUT HIM SINCE.

EVERYTHING HE HAS POSTED ABOUT ME HAS BEEN FALSE. I HAVE EVIDENCE TO BACK IT UP, AND THERE ARE SOME THINGS I CAN'T PROVE BECAUSE, YOU KNOW, IT'S LIKE ASKING IF YOU'RE SANTA CLAUS. YOU CAN'T PROVE THAT YOU'RE NOT. SO HE HAS PROVIDED NO EVIDENCE FOR ANY OF THESE CLAIMS THAT HE'S MADE AGAINST ME. AND SO I WOULD JUST REALLY LIKE IT TO STOP.

THE COURT: ALL RIGHT. ANYTHING ELSE?

THE PETITIONER: THAT'S ALL, YOUR HONOR.

THE COURT: ALL RIGHT. THANK YOU.

ALL RIGHT. PETITIONER AND RESPONDENT MURREY.

THE RESPONDENT: YES, YOUR HONOR. GIVE ME ONE SECOND. I'M JUST PULLING UP -- YES, YOUR HONOR.

THE COURT: I'D LIKE TO HEAR YOUR TESTIMONY, ALTHOUGH, YOU KNOW, IF YOU HAVE LIMITED QUESTIONS YOU'D LIKE TO ASK, THE COURT WOULD ALLOW THAT AS WELL.

THE RESPONDENT: YES, I WOULD LIKE TO ASK A FEW QUESTIONS BEFORE I GIVE MY LIMITED -- BEFORE I GIVE MY

BRIEF TESTIMONY.

THE COURT: GO AHEAD.

THE RESPONDENT: WHAT IS THE EMAIL ADDRESS -- WHAT IS THE EMAIL ADDRESS THAT SENT THE DIGITAL HATE MAIL?

BECAUSE I KNOW I'M UNDER OATH, AND I DID NOT SEND THAT. VALDES AND HER SUPPORTERS -- AND WE'RE TALKING ABOUT MILLIONS OF PEOPLE ON FACEBOOK, WHICH I NEVER USED -- MADE FUN OF ME FOR HAVING ZERO FOLLOWERS, BUT SHE'S SAYING THAT MY SUPPORTERS ARE SOMEHOW HARASSING. SO I WOULD LIKE THE EMAIL -- THE FULL EMAIL ADDRESS -- NAME AND THE EMAIL ADDRESS WHERE THAT DIGITAL HATE MAIL WAS ALLEGEDLY RECEIVED.

THE COURT: ALL RIGHT. I'M NOT GOING TO REQUIRE THE PETITIONER TO REVEAL HER OWN EMAIL ADDRESS IF THAT'S WHAT YOU'RE ASKING.

THE RESPONDENT: I'M NOT -- I JUST -- I KNOW I DIDN'T SEND THAT EMAIL, AND NO ONE RELATED TO ME SENT IT. SO I'D LIKE TO EITHER GET A CONTINUANCE AND --

THE COURT: ALL RIGHT. SO THAT'S YOUR TESTIMONY.

THE RESPONDENT: UH-HUH. THAT'S -- OKAY. I THOUGHT I WOULD HAVE A RIGHT TO CONFIRM THAT IN CASE MS. VALDES IS COMMITTING FRAUD ON THE COURT AND SENDING HERSELF FAKE EMAILS TO INCRIMINATE ME. THERE IS ACTUALLY ONE STATEMENT THAT VALDES AND HER CO-CONSPIRATORS MADE WHERE THEY SAID, "LET'S HIRE A DECOY TO NAIL HIS ASS." I HAVE THAT IN AN EXHIBIT SOMEWHERE, BUT IF THE COURT WON'T ALLOW ME TO FIND OUT THE EMAIL ADDRESS THAT I'M BEING ACCUSED OF BEING RELATED TO, WHICH I HAVE NO RELATION TO,

I GUESS I'LL MOVE FORWARD. I'D LIKE TO HAVE THAT ON RECORD, THOUGH; I WAS NEVER ABLE TO DO ANY DISCOVERY ON THIS.

THE COURT: YOU CAN GIVE SOME IDENTIFYING INFORMATION FROM THE EMAIL ADDRESS BUT NOT THE ENTIRE EMAIL ADDRESS, LIKE EMAIL ADDRESS THAT ENDS IN A CERTAIN WORD OR SOMETHING LIKE THAT.

THE RESPONDENT: OKAY. SURE.

THE COURT: IT IS YOUR -- SIR, IT IS YOUR BURDEN OF PROOF, JUST AS IT IS MS. VALDES'S, TO PROVE YOUR CASE. YOU BEAR THE BURDEN --

THE RESPONDENT: IF THE COURT --

THE COURT: -- OF SHOWING THE EVIDENCE.

THE RESPONDENT: I UNDERSTAND. WOULD THE COURT GIVE ME A WEEK TO DO DISCOVERY TO FIND OUT WHO SENT THAT EMAIL SO I CAN CONFIRM THAT IT HAS NOTHING TO DO WITH ME?

THE COURT: NO. WE'RE HAVING THE HEARING NOW.

THE RESPONDENT: OKAY. THEN --

THE COURT: DO YOU HAVE AN ANSWER?

I'M ASKING MS. VALDES IF SHE HAS A RESPONSE.

THE PETITIONER: I DO HAVE A RESPONSE.

THAT EMAIL WAS NOT MADE BY ME -- THE EMAIL ADDRESS WHERE THE HATE MAIL WAS SENT. IT WAS A GROUP EMAIL ADDRESS FOR THE DEFENDANTS OF THAT CASE THAT WAS PUBLISHED ON THE GOFUNDME FOR ANY HELP TO CONTACT US THERE. SO TO PROTECT US, WE DIDN'T USE OUR -- OUR EMAIL ADDRESSES. SO I DON'T KNOW OFF THE TOP OF MY HEAD. IT WAS SOMETHING ABOUT LADEFENDANTGALS OR SOMETHING.

BUT I JUST WANT TO MAKE IT CLEAR THAT I NEVER ALLEGED THAT HE SENT IT. I'M JUST ALLEGING THAT BECAUSE OF HIS INFLAMMATORY LANGUAGE AND FALSE ACCUSATIONS ABOUT US, WE HAVE, THEN, AS A RESULT, RECEIVED THIS KIND OF MAIL FROM PEOPLE.

THE COURT: I SEE. ALL RIGHT. GO AHEAD, SIR.

THE RESPONDENT: OKAY. WELL, FIRST OF ALL, MS. VALDES IS TALKING ABOUT A LESS-THAN-TWO-MINUTE TEXT CONVERSATION FROM 2019 --

THE COURT: ARE YOU ON TO TESTIMONY NOW, OR ARE YOU ASKING QUESTIONS?

THE RESPONDENT: -- AND SHE --

WELL, I WOULD -- IT SEEMS -- I THINK THAT THE MAIN THING THAT I WOULD LIKE TO GET FROM ASKING QUESTIONS IS THE FULL EMAIL ADDRESS OF WHAT WAS -- WHAT THE EMAIL ADDRESS WAS THAT SENT THAT ALLEGED DIGITAL HATE MAIL TO MS. VALDES.

THE COURT: SHE HAS ANSWERED YOUR QUESTION IN THAT REGARD.

THE RESPONDENT: I DIDN'T HEAR ANY PARTICULAR -- SHE ONLY SPOKE OF THE EMAIL ADDRESS TO WHICH IT WAS SENT, I BELIEVE, YOUR HONOR, NOT THE EMAIL ADDRESS ITSELF.

THE COURT: I'M SORRY. NOT THE EMAIL ADDRESS THAT WHAT?

THE PETITIONER: HE WANTS TO KNOW WHO IT CAME FROM.

THE RESPONDENT: WHO SENT IT.

THE COURT: OH, WHO IT CAME FROM?

THE RESPONDENT: YES. I WANT TO KNOW -- YES.

THE COURT: DO YOU KNOW WHO IT CAME FROM?

THE PETITIONER: I DO NOT KNOW. IT JUST SAYS J.C. ROUX, R-O-U-X.

THE RESPONDENT: THAT'S NOT AN EMAIL ADDRESS.

THE PETITIONER: THAT'S ALL I HAVE.

THE COURT: THAT'S YOUR ANSWER.

THE RESPONDENT: OKAY. WELL, I GUESS I COULD MOVE FORWARD WITH THE FACT THAT MS. VALDES FAILED TO FILE -- FAILED TO EVEN PROVIDE THE EMAIL ADDRESS THAT SHE ALLEGEDLY --

THE PETITIONER: YOUR HONOR --

THE COURT: YOU CAN -- NO. WE'RE NOT GOING TO HAVE COLLOQUY HERE ON THIS. YOU CAN MAKE OF THAT WHATEVER YOU WANT.

THE RESPONDENT: OKAY. THEN I CAN PROVIDE MY TESTIMONY NOW IF THE COURT WOULD LIKE.

THE COURT: YES, PLEASE.

THE RESPONDENT: OKAY. SO THE TWO-MINUTE -- LESS-THAN-TWO-MINUTE TEXTING THAT VALDES REFERS TO -- I MEAN, I DON'T KNOW THIS WOMAN. I'VE NEVER SEEN HER IN PERSON. AND WE -- SHE INITIATED A MATCH WITH ME ON A DATING APP, AND WE TEXTED FOR LESS THAN TWO MINUTES. NOW, I PROVIDED TO THE COURT IN MY RESPONSE -- I THINK IT'S EXHIBIT E -- HOW I'VE BEEN THE VICTIM OF DEFAMATION AND ONLINE GANG STALKING AND CYBER-BULLYING SINCE AT LEAST 2015. YOU KNOW, I DON'T KNOW IF THIS IS THE -- MY FIRST COUPLE BOOKS THAT WERE PUBLISHED --

THE REPORTER: EXCUSE ME, YOUR HONOR. COULD HE

PLEASE SLOW DOWN? HE SOUNDS MUFFLED.

THE COURT: YOU NEED TO -- MR. MURREY, YOU NEED TO SLOW DOWN. THE COURT REPORTER IS HAVING A HARD TIME TRANSCRIBING YOUR TESTIMONY. THE CONNECTION IS NOT GREAT.

THE RESPONDENT: I'M SORRY. OKAY.

THE COURT: GO AHEAD.

THE RESPONDENT: SO I DO HAVE -- I DO HAVE POLITICAL VALUES, BUT THEY'RE ALL REASONABLE AND LEGITIMATE AND WELL WITHIN, YOU KNOW, OUR CIVIL RIGHTS, EXPRESSION OF FREE SPEECH. NOAM CHOMSKY -- NOAM CHOMSKY IS ON THE BACK OF MY BOOK -- THE FIRST BOOK THAT I PUBLISHED IN 2014 AND '15. AND SINCE 2016, THERE'S BEEN ANONYMOUS GANG STALKING AND CYBER-BULLYING OF MY PERSON. AND I INCLUDE EVIDENCE OF THAT INTO MY RESPONSE, AND I HAVE EXHIBIT E, I BELIEVE, IN MY PAPERS. LET ME JUST CONFIRM THAT. AND I'M JUST LAYING THE FOUNDATION BEFORE I GIVE MY RESPONSE TO PARTICULAR THINGS THAT VALDES BROUGHT UP.

LET ME SEE HERE. OKAY. YES. OKAY.

IN ANY CASE, SO WHAT HAPPENED IN THE LESS-THAN-TWO-MINUTE TEXT EXCHANGE WITH THIS WOMAN, WHO I DON'T EVEN KNOW AND I'VE NEVER MET IN PERSON, WAS THAT I QUICKLY SUSPECTED THAT SHE WAS PART OF THIS GROUP TRYING TO ENTRAP ME. AND IT WASN'T, YOU KNOW, WONDERFULLY CIVIL, BUT ALSO, SHE WAS USING THREATENING, VULGAR LANGUAGE LIKE THE F WORD AND STUFF. AND SO WE BASICALLY, LIKE, TEETERED OUT IN LESS THAN TWO MINUTES, AND I

REJECTED HER AND BLOCKED HER AND MOVED ON WITH MY LIFE. NEVER THOUGHT ABOUT HER AGAIN.

NOW, ACCORDING TO MS. VALDES, WHAT HAPPENS NEXT IS THAT SHE INNOCENTLY LATER FOUND A WOMAN WHO POSTED A THREAD ABOUT ME ONLINE, AND MS. VALDES WANTED TO SPEAK HER TRUTH. THAT'S ALL FALSE. IN TRUTH AND ACTUAL FACT, WHAT HAPPENED IS MS. VALDES FOUND A POST BY KELLY GIBBONS OF THE RELATED CASE THAT THIS COURT -- THIS COURT HAS HEARD GIBBONS'S NAME BEFORE.

SO KELLY GIBBONS, WHO IS CURRENTLY A NAMED AND SERVED -- A DEFENDANT IN MY PENDING LAWSUIT FOR DEFAMATION, ALSO IN STANLEY MOSK, HER ANTI-SLAPP HAS JUST FAILED, AND MY CASE IS MOVING FORWARD AGAINST HER FOR FALSELY ACCUSING ME OF MURDER, HAVING STD'S, HAVING A FRAUDULENT PH.D. FROM YALE, HAVING -- I MEAN, EVERYTHING UNDER THE SUN. IT'S ALMOST LIKE THEY WENT TO JURY INSTRUCTIONS TO DEFAME SOMEONE.

IN ANY CASE, THERE'S A COUPLE OTHER DEFENDANTS, TOO. IT'S ALSO MOVING FORWARD AGAINST AMY BLALCOK, WHO ACCUSED ME OF BEING RESPONSIBLE FOR EVERY MISSING WOMAN IN LOS ANGELES -- OR MAYBE MORE. SO HER ANTI-SLAPP ALSO FAILED. AND ELLY SHARIAT, A NAME THAT THIS COURT HAS ALSO HEARD TODAY. SHARIAT HAS BEEN DIFFICULT TO SERVE BECAUSE SHE'S BEEN AGGRESSIVE AND HOSTILE WITH SERVICE, AND SHE DEVELOPED A FICTIONAL STORY OF ME STALKING HER, EVEN THOUGH I HAVE NO IDEA WHO SHARIAT IS. I NEVER -- I DON'T EVEN THINK I HAD A TWO-MINUTE TEXT EXCHANGE WITH HER.

BUT MS. VALDES, MS. GIBBONS, SHARIAT, BLALOCK, AND COUNTLESS OTHERS USED THESE HARMFUL STORIES TO HARM MY REPUTATION, AND THEY CALL THEM TESTIMONIALS ABOUT DATING IN A SECRET FACEBOOK GROUP CALLED "ARE WE DATING THE SAME GUY?" AND THIS HAS MILLIONS OF USERS, BUT IT DOESN'T LET PEOPLE WHO FIND OUT ABOUT THE DEFAMATION JOIN THE GROUP. SO MY FREE SPEECH WAS DENIED. I COULDN'T JOIN THE GROUP TO SAY, "BY THE WAY, ALL THESE STATEMENTS ARE FALSE. THIS IS REALLY HARMFUL."

AND THEY WERE NOT ONLY CONSPIRING -- VALDES WAS CONSPIRING WITH GIBBONS AND SHARIAT AND OTHERS, DOING THIS IN SECRET, THEY WERE -- AND, BY THE WAY, YOUR HONOR, I WOULD LIKE TO ADD A NOTE. EXHIBIT H SHOWS THE VALDES POSTS. THIS IS JUST A FRACTION OF THE HUNDREDS OF POSTINGS THAT VALDES MADE ABOUT ME IN THIS GROUP. AND THIS WAS NOT HER TRUTH. VALDES SAID I NEEDED TO BE ARRESTED FOR CRIMES THAT I'VE COMMITTED. OKAY. REJECTING VALDES IS NOT A CRIME. YOU KNOW, I MEAN, IT'S JUST TOTALLY ABSURD.

AND THERE'S -- I THINK THERE'S AT LEAST, LIKE, ABOUT 10 TO 20 INTERACTIONS OF VALDES IN THIS GROUP, YOU KNOW, WHICH IS EVIDENCE I'VE OBTAINED SHOWING THAT FOR A TWO-MINUTE TEXT EXCHANGE IN 2019, SINCE THEN, VALDES HAS BEEN OBSESSED WITH ME AND MAKING THESE POSTINGS ABOUT ME FOR YEARS AFTERWARDS.

NOW, WHEN I OBTAINED THIS EVIDENCE RIGHT BEFORE FILING MY LAWSUIT, I FILED A PUBLIC LAPD AND FBI REPORT ABOUT THIS ONLINE CYBER-BULLYING AND GANG STALKING

AND DEFAMATION. AND RIGHT AFTER I FILED THOSE REPORTS, ALL OF THESE COMMENTS CAME DOWN, INCLUDING GIBBONS'S MAIN THREAD, WHICH STARTED THIS. GIBBONS WHO'S CURRENTLY EVADING BEING SERVED. THAT MEANS VALDES'S COMMENTS WERE ALSO DELETED. SO FOR -- VALDES FAILED TO INFORM THIS COURT ABOUT THAT BECAUSE SHE, YOU KNOW, IS SEEKING TO DEFUSE IT AND COMMIT FRAUD UPON IT.

AND I ALSO WANT TO MAKE CLEAR THAT BECAUSE THIS IS THE FIRST TIME -- OH, AND I'M SORRY. THERE'S ONLY ONE MORE THING I NEED TO ADD TO THIS PORTION OF MY TESTIMONY. MS. VALDES AND THE OTHER CO-CONSPIRATORS -- GIBBONS, SHARIAT, AND OTHERS -- AFTER I -- I FILED MY LAWSUIT AND FILED MY EXHIBITS AND THEY SAW WHAT I HAD, THEY LAUNCHED A MEDIA SMEAR CAMPAIGN AGAINST ME ON NATIONAL AND INTERNATIONAL NEWS MEDIA OUTLETS. AND I BELIEVE THAT IS EXHIBIT A IN MY RESPONSE.

SO YOU CAN SEE VALDES ON NEWS MEDIA OUTLETS IN LOS ANGELES, YOU KNOW, AND ALL OVER THE COUNTRY AND ALSO ALL OVER THE WORLD -- WHETHER IT'S ENGLISH NEWS MEDIA OUTLETS OR, YOU KNOW, GOD KNOWS WHERE. AND ALL SHE'S DOING IS TALKING ABOUT THE CASE AND MISREPRESENTING EVERYTHING.

NOW, IN TERMS OF THEIR GOFUNDME, ON THEIR GOFUNDME WEB PAGE THAT THEY DEVELOPED, WHICH HAS SINCE BEEN FROZEN, YOU SEE VALDES'S NAME RIGHT NEXT TO GIBBONS'S NAME RIGHT NEXT TO SHARIAT'S NAME AND RIGHT NEXT TO OTHER NAMES AND DEFENDANTS THAT ARE CURRENTLY BEING PROSECUTED IN THAT CASE. SO I CAN FIND THE PAGE

FOR THAT IF THE COURT -- I HAVE THAT SOMEWHERE. IT WILL JUST TAKE ME A SECOND TO FIND IT. THAT'S ACTUALLY ALSO AN IMPORTANT EXHIBIT. LET ME SEE HERE. HERE WE GO. AND THE GOFUNDME WEB PAGE THAT VALDES POSTED WAS ALSO AGGRESSIVELY PROMOTED IN HER NEWS MEDIA SMEAR CAMPAIGN ON NATIONAL AND INTERNATIONAL NEWS.

I'M LOOKING FOR THE GOFUNDME. I CAN COME BACK TO THAT. SO --

THE COURT: HOW MUCH MORE TIME DO YOU NEED, SIR?

THE RESPONDENT: I NEED JUST A FEW MORE MINUTES, I BELIEVE, YOUR HONOR.

THE COURT: ALL RIGHT.

THE RESPONDENT: AND THEN EVERYTHING THAT VALDES IS DISCUSSING ARE ALL PUBLIC DOCUMENTS. SO SHE'S ACTING LIKE I SOMEHOW CHERRY-PICKED HER ADDRESS OR TELEPHONE NUMBER. THESE ARE ALL -- THIS IS ALL INFORMATION THAT VALDES HERSELF PROVIDED TO THE COURT IN PUBLIC COURT FILINGS, OR THE NAMES THAT SHE'S REFERRING TO HAVE TO DO WITH NAMES THAT WERE INCLUDED WITH MY LAPD OR FBI REPORTS, TOTALLY PUBLIC. AND THEY WERE ALSO MADE PUBLIC IN MY OWN FILINGS, WHICH THE OTHER COURT SAW AS LEGITIMATE. AND I HAVE PROVIDED TO THE COURT THE ANTI-SLAPP RULING AND THE MOTION SO THIS COURT CAN DECIDE FOR ITSELF IF IT WAS A FAIR RULING OR NOT, REGARDLESS OF WHAT HAPPENED.

IN ANY CASE, THERE'S NOT A SINGLE THING THAT VALDES ACCUSES ME OF PUBLISHING THAT HAS TO DO WITH DOXXING THAT WAS NOT ALREADY A PUBLIC COURT DOCUMENT.

BUT WHETHER OR NOT VALDES WOULD LIKE TO DO A MOTION TO SEAL OR A MOTION IN THE ORIGINAL CASE FOR SOME SORT OF INJUNCTION OR SOME SORT OF LEGAL REMEDY THAT HAS TO DO WITH DEALING WITH PUBLIC DOCUMENTS, BUT NONE OF WHICH SHE'S TRIED, YOU KNOW, I THINK THAT THAT SHOWS THAT SHE IS BASICALLY SEEKING TO CONTINUE TO HARASS ME AND SECRETLY DEFAME ME WITHOUT ME HAVING MY OWN RIGHT TO FREE SPEECH, WHICH THE COURT PROBABLY UNDERSTANDS I NEED TO URGENTLY RESPOND TO REHABILITATE MY REPUTATION.

I CAN FIND THE GOFUNDME EXHIBIT -- BECAUSE I THINK THAT'S A CRITICAL EXHIBIT -- IF THE COURT WOULD LIKE.

THE COURT: THE COURT'S NOT GIVING DIRECTION, ONE WAY OR ANOTHER, TO YOU HOW TO MAKE YOUR CASE.

THE RESPONDENT: OKAY. I -- OKAY. SURE. I WOULD LIKE TO FIND THE GOFUNDME EXHIBIT SO THE COURT CAN SEE VALDES CONSPIRING --

THE COURT: IS THIS IN YOUR PETITION?

THE RESPONDENT: -- WITH SHARIAT AND --

YES, IT -- ACTUALLY, YES. IT'S CERTAINLY IN MY PETITION. I WAS LOOKING FOR MY RESPONSE; SO LET ME GO TO -- LET ME SHIFT MY PETITION REALLY QUICK.

EXHIBIT 1, ALSO, IN MY PETITION HAS TO DO WITH AN ACTUAL VERSION OF INCITEMENT. I RECEIVED A DEATH THREAT WHERE --

THE COURT: ARE YOU ON THE SAME TOPIC NOW, OR HAVE YOU MOVED ON TO SOMETHING ELSE?

THE RESPONDENT: WELL, IT'S INTERRELATED, BUT I

GUESS THIS IS -- BUT LET ME FIND THE GOFUNDME EXHIBIT IN MY -- OH, THERE WE GO. OKAY. SO IN -- YEAH, SO IF THE COURT LOOKS AT EXHIBIT 3 OF MY PETITION, IT WILL SEE, ON THE SECOND PAGE OF THAT EXHIBIT, THE NAMES VANESSA VALDES, KELLY GIBBONS, ELLY SHARIAT AS WELL AS THE OTHER -- OTHER CO-CONSPIRATORS OF VALDES WHO SECRETLY DEFAMED ME IN THE SECRET FACEBOOK GROUP.

THE COURT: GO ON.

THE RESPONDENT: SO VALDES HAS CLAIMED THAT SHE'S SOMEHOW DISCONNECTED FROM PEOPLE WHO ARE TRULY BEING PROSECUTED FOR DEFAMATION, AND THEIR ANTI-SLAPPS HAVE ALREADY FAILED. SO IT'S A MISREPRESENTATION -- I MEAN, IT'S LITERALLY PERJURY. SO -- AND AS THE COURT CAN SEE FROM THE EXHIBIT ABOUT THE GOFUNDME EXHIBIT, EXHIBIT -- ACTUALLY, THE FIRST EXHIBIT, YOU CAN SEE THAT BECAUSE OF THE DEFAMATION FROM MS. SHARIAT'S FICTIONAL STORY OF STALKING AND THE NEWS MEDIA'S SMEAR CAMPAIGN THAT'S NATIONAL AND INTERNATIONAL AND THEIR GOFUNDME WEB PAGE THAT I JUST DIRECTED THE COURT TO, WHICH ALSO INCLUDES SHARIAT'S FICTIONAL STORY OF STALKING, NOW PEOPLE ARE SAYING ONLINE, "THIS GUY HAS TO BE TAKEN OUT TO THE DESERT AND PUT SIX FEET UNDER SOMEWHERE WITH" -- "WHERE NOBODY KNOWS WHERE HE WOULD BE FOUND." AND HE HAS TO -- THAT THEY HAVE TO USE PEPPER TO HURRY UP AND DISSOLVE THE CORPSE AS SOON AS POSSIBLE. I MEAN, THAT'S THE LANGUAGE THAT'S BEING USED BECAUSE OF VALDES'S HATEFUL CONSPIRACY THAT SHE'S A PART OF.

SO MY POSITION IS, ESSENTIALLY, I -- AT THE

VERY LEAST, I NEED MY FREE SPEECH TO PUBLIC -- TO PUBLISH ALREADY PUBLIC COURT DOCUMENTS AND MAKE REASONABLE ARTICLES ABOUT THEM. AND, YOU KNOW, I'M NOT RESPONSIBLE FOR WHAT OTHER PEOPLE DO. I'VE NEVER TOLD ANYBODY TO SEND VALDES ANYTHING. I'VE NEVER TOLD ANYONE TO HARASS THESE WOMEN. I HAVE -- I'VE SPOKEN OUT ABOUT HOW THEIR SECRET FACEBOOK GROUP IS NOT WHAT IT CLAIMS TO BE. AND I HAVE A RIGHT TO RESPOND TO THIS -- THIS STRANGE MACHINERY TO HARM MY LIFE, BECAUSE IT'S OUT THERE. AND I'M TAKING PROPER LEGAL ACTION AND --

THE COURT: ALL RIGHT. ALL RIGHT. YOU'VE UTILIZED FAR MORE THAN THE TWO MINUTES YOU SAID YOU NEEDED, BUT THAT'S OKAY.

I'LL ALLOW MS. VALDES THE OPPORTUNITY TO ASK YOU QUESTIONS IF SHE WISHES.

THE PETITIONER: I DO, YOUR HONOR.

THE COURT: GO AHEAD.

THE PETITIONER: IN TERMS OF THE INITIATION OF THE HINGE MATCH, I HAVE EVIDENCE THAT HE INITIATED A MATCH WITH ME --

THE COURT: QUESTIONS.

THE PETITIONER: -- SO I WOULD LIKE HIM TO --

THE COURT: YOU CAN ASK A DIRECT QUESTION.

THE PETITIONER: OKAY. MR. MURREY, I WOULD LIKE TO KNOW IF YOU HAVE EVIDENCE OF ME INITIATING A MATCH WITH YOU, BECAUSE I HAVE EVIDENCE OF YOU INITIATING ONE WITH ME.

THE RESPONDENT: OKAY. I FIND THIS IRRELEVANT AND

ABSURD, BUT I WILL SAY THAT THERE'S NO DATING APP WHERE TWO PEOPLE CAN START TEXTING EACH OTHER WITHOUT THEM BOTH INITIATING A MATCH.

THE PETITIONER: INITIATION IS THE FIRST -- THE FIRST INTERACTION. I HAVE ONE OF YOU ASKING ME -- NOT ASKING BUT SUGGESTING, "LET'S HANG," AND GIVING ME YOUR PHONE NUMBER, COMMENTING ON ONE OF MY PHOTOS BEFORE I EVER RESPONDED TO YOU.

SO MY QUESTION IS HOW ARE YOU LOGICALLY, REASONABLY MAKING THE ASSUMPTION THAT I CAME AFTER YOU WHEN I KNEW YOU DID NOT EXIST UNTIL YOU INITIATED A MATCH WITH ME?

THE RESPONDENT: OKAY. MY RESPONSE IS THAT YOU'RE REFERRING TO A LESS-THAN-TWO-MINUTE TEXT EXCHANGE FROM 2019 IN REGARD TO MYSELF. BOTH OF US HAD NEVER MET EACH OTHER. SO -- AND THIS TEXTING MOMENT YOU'RE REFERRING TO IS PROBABLY 2 PERCENT OF THE POSTINGS THAT YOU MADE ABOUT ME AND YOUR OBSESSION WITH ME AFTERWARDS IN THE SECRET FACEBOOK GROUP THAT YOU DID TO HARM MY LIFE. SO I --

THE PETITIONER: YOUR HONOR --

THE COURT: JUST ANSWER THE QUESTION YOU'RE BEING ASKED.

THE PETITIONER: THE QUESTION IS --

THE RESPONDENT: WELL, I'M NOT SURE WHAT THE QUESTION IS.

THE PETITIONER: THE QUESTION IS DO YOU HAVE EVIDENCE OF ME INITIATING ANYTHING, ANY INTERACTION WITH YOU?

THE RESPONDENT: YES, I DO. YOU TEXTED ME BACK.

THE PETITIONER: OKAY. THAT'S NOT INITIATION.

SO, YOUR HONOR, I HAVE PROOF THAT HE INITIATED AN INTERACTION WITH ME, DISPROVING HIS CONSPIRACY THEORY THAT I KNEW OF WHATEVER ACTIONS -- I DID NOT KNOW OF HIM UNTIL THE DAY HE MATCHED WITH ME ON HINGE, AND I HAVE EVIDENCE PROVIDED IN MY PETITION.

THE OTHER QUESTION --

THE RESPONDENT: THAT'S A DIFFERENT ISSUE.

THE PETITIONER: I'M SORRY. THE OTHER QUESTION I HAVE: DID I EVER PROVIDE YOU WITH MY WORK EMAIL ADDRESS EVER OR GIVE YOU PERMISSION TO POST IT?

THE RESPONDENT: OKAY. SO MY RESPONSE TO THAT IS IN A LAWSUIT INITIATING --

THE COURT: JUST -- THIS IS A PRETTY -- SIR, THIS IS A PRETTY SIMPLE QUESTION --

THE RESPONDENT: YES.

THE COURT: -- IN TWO PARTS, AND I THINK YOU CAN ANSWER BOTH OF THEM WITH A "YES" OR "NO."

THE RESPONDENT: OKAY. A PROCESS SERVER OBTAINED HER INFORMATION TO SERVE HER MY DEFAMATION LAWSUIT, AND EVERYTHING WAS DONE LEGALLY AND PROPERLY. AND, ALSO, I'D LIKE TO ADD, I NEVER CAME TO VALDES'S RESIDENCE. SHE LIED ABOUT THAT. I HAD A PROCESS SERVER SERVE HER THE DOCUMENTS.

THE COURT: YOU'RE MOVING ON TO SOMETHING ELSE. IT'S NONRESPONSIVE.

THE PETITIONER: UNDER EXHIBIT B, I HAVE A DOCUMENT

OF HIM POSTING MY WORK ADDRESS --

WHICH I NEVER GAVE TO YOU. CAN YOU CONFIRM THAT I NEVER GAVE YOU MY WORK ADDRESS?

THE RESPONDENT: I CANNOT. I DO NOT HAVE ALL OF YOUR PUBLIC FILINGS BEFORE ME. I REMEMBER YOU POSTING AND -- ARE -- YOU'RE SAYING AN EMAIL ADDRESS; RIGHT?

THE PETITIONER: MY WORK EMAIL ADDRESS.

THE COURT: SO DO YOU NOT REMEMBER? DO YOU NOT KNOW? IS THE ANSWER "YES" OR "NO"?

THE RESPONDENT: I DO NOT REMEMBER. AND I'M NOT SURE IF THIS WAS OBTAINED PROPERLY THROUGH A LEGAL PROCESS SERVER, BUT I DO KNOW THAT DURING THE COURSE OF --

THE COURT: ALL RIGHT. YOU'VE ANSWERED -- YOU'VE ANSWERED THE QUESTION. YOU'RE TURNING THESE QUESTIONS INTO AN OPPORTUNITY TO PROVIDE ADDITIONAL TESTIMONY, AND THAT'S NOT THE PURPOSE --

THE RESPONDENT: SORRY.

THE COURT: -- THAT'S NOT THE PURPOSE OF CROSS-EXAMINATION.

THE RESPONDENT: I -- I -- I WOULD SIMPLY LIKE TO SAY ABOUT HER WORK EMAIL ADDRESS, IT WAS ONLY USED TO SERVE LEGAL PAPERS. I'VE NEVER CONTACTED MS. VALDES PERSONALLY. I HAVE NO INTEREST IN HER. I NEVER DID.

THE PETITIONER: HE DID, HOWEVER, POST IT ON A BLOCKCHAIN WEBSITE.

THE COURT: SHE'S STATING THAT IT WAS POSTED, AND THAT'S THE OFFENSE THAT SHE'S CONCERNED ABOUT.

ALL RIGHT. GO AHEAD. ANY OTHER QUESTIONS?

THE RESPONDENT: THEY WERE POSTED IN THE CONTEXT -- YEAH.

THE COURT: ARE THERE ANY OTHER QUESTIONS?

THE PETITIONER: I DO.

DO YOU HAVE EVIDENCE OF ANY OF THE CLAIMS YOU'VE MADE ABOUT ME ONLINE REGARDING THE CIA, ISRAELI GOVERNMENT, FACEBOOK CRIMES -- OH, GOSH -- THE ITALIAN MOB? DO YOU HAVE ANY EVIDENCE OF ANY OF THESE CLAIMS THAT YOU'VE MADE AGAINST ME?

THE RESPONDENT: I -- I DID NOT MAKE THESE CLAIMS AGAINST YOU; SO I DON'T KNOW WHAT YOU'RE TALKING ABOUT. I DO KNOW THAT THESE AGENCIES LIKE TO USE USEFUL IDIOTS THAT ARE UNAWARE OF WHAT'S HAPPENING IN SOME OF THEIR OPERATIONS.

THE PETITIONER: YOUR HONOR, AGAIN, EXHIBIT C SHOWS THE ARTICLE --

THE RESPONDENT: IT'S --

THE COURT: PLEASE DON'T INTERRUPT.

THE PETITIONER: -- "ARE WE BEING MURDERED BY THE SAME INTELLIGENCE MAFIA FROM EPSTEIN'S PEDOPHILE NETWORK TO FACEBOOK, UNITED STATES, ISRAELI CYBER CRIMINALS?" BY STEWART LUCAS MURREY, IN 2023, LISTING MY NAME AS, QUOTE, "BELOW ARE THEIR NAMES AS FAKE AND UNFORTUNATE AS THEY ARE AND ALL OF WHOM, AS NOTED ABOVE, HAVE APPEARED IN BOTH POLICE AND FBI REPORTS FOR THEIR SERIOUS CRIMES OF CYBER-BULLYING AND ELECTRONIC HARASSMENT."

MR. MURREY, DO YOU HAVE PROOF OF ANY OF

THOSE CLAIMS?

THE RESPONDENT: YES, I DO. MY CASE IS CURRENTLY BEING LITIGATED AGAINST AN ANONYMOUS CREATOR OF THE FACEBOOK GROUP THAT OPERATES IN SECRET THAT YOU WERE A PART OF BEFORE ALL OF YOUR COMMENTS WERE DELETED, AND THE CASE IS NOT YET FINISHED.

THE COURT: ALL RIGHT. ALL RIGHT. YOU'VE ANSWERED THE QUESTION.

THE PETITIONER: SO I -- JUST TO CLARIFY, YOU'RE POSTING THAT YOU KNOW THE ANSWERS BEFORE YOUR LITIGATION HAS BEEN COMPLETED; IS THAT CORRECT?

THE RESPONDENT: I'M SORRY. I DIDN'T UNDERSTAND THE QUESTION.

THE PETITIONER: THE QUESTION IS GIVEN THAT YOU'RE POSTING PUBLICLY THAT I AM A CRIMINAL AND THAT I'M INVOLVED IN ALL OF THESE AFFILIATIONS WITH EPSTEIN, CIA -- YOU'RE POSTING THOSE NOW, BUT YOUR LITIGATION -- YOUR LITIGATION AND INVESTIGATION INTO THESE CONSPIRACY THEORIES HAS NOT BEEN COMPLETED; IS THAT CORRECT?

THE RESPONDENT: THAT IS NOT CORRECT. SO WHAT YOU'RE TALKING ABOUT IS A POLICE AND FBI REPORT THAT'S PUBLIC -- A PUBLIC DOCUMENT, WHAT I ENTERED. THE VULGAR MISCONSTRUING OF MY ARTICLE, WHICH I ACTUALLY PROVIDED TO THE COURT IN MY OWN PAPERS SO THAT THE COURT COULD READ THE ENTIRE ARTICLE -- IT'S NOT LONG; IT'S, LIKE, FIVE OR SIX PAGES WITH A BUNCH OF PICTURES -- MY SUGGESTION IN THE ARTICLE IS THAT -- QUITE SIMPLY, THAT THE CIA IS KNOWN TO WORK WITH FACEBOOK AND THESE SECRET FACEBOOK

GROUPS THAT ARE TARGETING AND HARMING PEOPLE WHO HAVE NOT DONE THE THINGS THAT THEY'RE DEFAMED FOR IS HIGHLY SUSPICIOUS.

AND I REFER TO MY OWN CASE THAT'S SOMETHING THAT'S A PUBLIC INTEREST, IS GOING TO GO FORWARD, AND CONTINUE TO BE A PUBLIC INTEREST. AND THEN I SAY THESE PEOPLE ARE SUSPICIOUSLY RELATED TO THIS ACTION, AND THESE ARE THE NAMES THAT I'VE RECOVERED IN PUBLIC DOCUMENTS WITH THE LAPD AND THE FBI -- POLICE AND FBI REPORTS THAT ARE FILED, ALL OF WHICH IS LEGAL AND ABLE FOR PEOPLE TO DISCUSS AS IT'S A PUBLIC ISSUE.

MY SUGGESTION IS THAT --

THE COURT: ALL RIGHT. NO, NO, NO. YOU'VE ANSWERED THE QUESTION. WE'RE NOT GOING TO LISTEN TO ADDITIONAL TESTIMONY ABOUT WHAT YOU SUGGEST. IT'S NOT RELEVANT TO THE QUESTION THAT WAS ASKED.

THAT HAVING BEEN SAID, I THINK THE COURT HAS HEARD SUFFICIENT EVIDENCE IN THIS CASE AND HAS REVIEWED THE EVIDENTIARY FILE AND HAS HEARD THE TESTIMONY OF BOTH PARTIES IN BOTH OF THESE MATTERS. IN THE CASE OF -- THE COURT HAS ALSO ASSESSED THE CREDIBILITY AND DEMEANOR OF THE PARTIES.

IN THE CASE OF VALDES HERE IN THE COURTROOM AND THE CASE OF MURREY ONLINE WITHOUT A CAMERA, IT'S BEEN A LITTLE BIT MORE DIFFICULT, BUT THE COURT, GIVEN THE CIRCUMSTANCES AND THE DESIRE OF PETITIONER TO MOVE AHEAD, HAS DONE ITS BEST.

THE COURT FINDS THAT THE PETITIONER IN

VALDES VERSUS MURREY HAS NOT MET THE APPLICABLE BURDEN OF PROOF OF CLEAR AND CONVINCING EVIDENCE AND THAT GOOD CAUSE DOES NOT EXIST TO ISSUE RESTRAINING ORDERS AND DISSOLVES THE RESTRAINING ORDER THAT'S CURRENTLY IN EFFECT.

IN THE CASE OF MURREY VERSUS VALDES, THE COURT FINDS THAT THE PETITIONER HAS NOT MET THE APPLICABLE BURDEN OF PROOF AND GOOD CAUSE DOES NOT EXIST TO ISSUE RESTRAINING ORDERS IN THAT MATTER.

THOSE ARE THE RULINGS OF THE COURT IN THESE TWO MATTERS.

THE RESPONDENT: UNDERSTOOD, YOUR HONOR. THANK YOU.

THE COURT: THAT BRINGS THESE MATTERS TO A CONCLUSION.

WE DO HAVE THREE REMAINING MATTERS --

THE RESPONDENT: YOUR HONOR?

THE COURT: YES?

THE RESPONDENT: I'M SORRY. COULD I JUST -- ONE MORE -- COULD I PLEASE HAVE THE CONTACT INFORMATION OF THE COURT REPORTER IN CASE I'D LIKE TO OBTAIN THE TRANSCRIPT?

THE COURT: YOU CAN CONTACT THE COURT REPORTER AFTER THE HEARING IS OVER.

THE CLERK: I'LL EMAIL HIM.

THE COURT: THE JUDICIAL ASSISTANT WILL PROVIDE YOU WITH THAT INFORMATION BY EMAIL.

///

(THE PROCEEDINGS IN THE ABOVE-ENTITLED MATTER WERE CONCLUDED.)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT 25 HON. RICHARD BLOOM, JUDGE

VANESSA VALDES, PETITIONER/RESPONDENT, VS. STEWART LUCAS MURREY, RESPONDENT/PETITIONER.	NO. 24STRO02552
AND RELATED CASE NOS. 24STRO03710; 24STRO04181; 24STRO04183.	

I, ANGELICA ORSAT, OFFICIAL COURT REPORTER OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, FOR THE COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE FOREGOING PAGES, 1 THROUGH 45, INCLUSIVE, COMPRISE A FULL, TRUE, AND CORRECT TRANSCRIPT OF THE PROCEEDINGS HELD IN THE ABOVE-ENTITLED MATTER ON JULY 11, 2024.

DATED THIS 18TH DAY OF SEPTEMBER, 2024.

ANGELICA ORSAT, CSR NO. 14385
OFFICIAL COURT REPORTER

EXHIBIT 22

Sheriff's Department
Los Angeles County

COUNTER RECEIPT

Operator I.D. : E678490

Receipt Number : 1122406170151

Receipt Date: 06/17/24

Branch Number : 12 LOS ANGELES

Phone: (213)972-3930

Received From : DR. STEWART LUCAS MURREY

Cash Amount : $ 50.00

Check Amount : $ 0.00

Robert G. Luna, SHERIFF

By:_____

This receipt references the following cases(s):

Court Case Number	Court
24STRO04183	19100

*** To see if your process has been served, please visit our web site at:**

http://civil.lasd.org

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Stanley Mosk Dept. - 25

24STRO04183
Murrey, Dr. Stewart Lucas
vs
Gibbons, Kelly

August 8, 2024
8:30 AM

Honorable Richard Bloom, Judge

A. Conti, Judicial Assistant
Presley Rodriguez, Court Services Assistant

Angelica Orsat(#14385), Court Reporter

NATURE OF PROCEEDINGS: Petition - Civil Harassment (violence) filed by Petitioner on June 13, 2024

The following parties are present for the aforementioned proceeding:

No Appearances

The matter is called for hearing.

As of 9:17 AM there is no appearance by or for either party. No Proof of Service of the moving papers on Respondent has been filed.

Based on Petitioner's failure to appear, the Request for Restraining Order is dismissed without prejudice for lack of prosecution. All temporary orders, if any, are dissolved.

The Court makes its order in open court. Further notice of this proceeding is not required.

EXHIBIT 23

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Stanley Mosk Dept. - 25

24STRO02552
Valdes, Vanessa
vs
Murrey, Stewart Lucas

May 7, 2024
8:30 AM

Honorable Richard Bloom, Judge

Angela Conti, Judicial Assistant
Presley Rodriguez, Court Services Assistant

Angelica Orsat(#14385), Court Reporter

NATURE OF PROCEEDINGS: Petition - Civil Harassment (violence) filed by Petitioner on April 12, 2024

The following parties are present for the aforementioned proceeding:

Vanessa Valdes, Petitioner

The matter is called for hearing.

Court and Petitioner confer on status of service.

Petitioner has been unable to have Respondent served with the moving papers.

The Court finds that after diligent effort, the petitioner has been unable to accomplish personal service and grants the Order for Alternate Service (form 117).

Alternative methods of service include the following:

-Service by Email and Mail

Proof of Mailing shall be filed no later than May 14, 2024.

Mail should be by Certified Mail with a Certificate of Mailing and filed with the Proof of Service.

Pursuant to the request of Petitioner, the Request for Restraining Order is continued to May 30, 2024, at 8:30 AM, in Stanley Mosk Dept. 25. All temporary orders, if any, remain in full force and effect. There will be no further continuances absent good cause.

Order on Request to Continue Hearing (form 116) with the attached Order for Alternate Service (form 117) is signed by the Court and filed this date.

Petitioner is personally served this date with certified copies of the Order on Request to Continue Hearing. Petitioner must arrange for service of the Order and all moving papers on Respondent.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Family Division

Stanley Mosk Dept. - 25

24STRO02552
Valdes, Vanessa
vs
Murrey, Stewart Lucas

May 7, 2024
8:30 AM

A certified copy of the Order on Request to Continue Hearing is forwarded by the Judicial Assistant this date to the Sheriff for CLETS entry.